

**EXHIBIT 106-B**  
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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

IN RE: FACEBOOK, INC. MDL No. 2843  
CONSUMER PRIVACY USER Case No. 18-md-02843-VC-JSC  
PROFILE LITIGATION

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REMOTE DEPOSITION OF JACKIE CHANG

Thursday, December 16, 2021

Job No. 4976949

Reported Remotely and Stenographically by:

JANIS JENNINGS, CSR No. 3942, CLR, CCRR

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REMOTE DEPOSITION OF JACKIE CHANG, located  
in Hillsborough, California, taken on behalf of the  
Plaintiffs, beginning at 9:43 a.m., on Thursday,  
December 16, 2021, sworn remotely by Janis Jennings,  
Certified Shorthand Reporter No. 3942, CLR, CCRR,  
located in the City of Walnut Creek, County of  
Contra Costa, State of California.

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1 REMOTE APPEARANCES:

2  
3 For Plaintiffs:

4 KELLER ROHRBACK L.L.P.

5 BY: DEREK W. LOESER, ESQ.

6 DAVID KO, ESQ.

7 ADELE A. DANIEL, ESQ.

8 1201 Third Avenue, Suite 3200

9 Seattle, Washington 98101

10 206.623.1900

11 dloeser@kellerrohrback.com

12 dko@kellerrohrback.com

13 adaniel@kellerrohrback.com

14  
15 BLEICHMAR FONTI & AULD LLP

16 BY: LESLEY E. WEAVER, ESQ.

17 ANNE K. DAVIS, ESQ.

18 MATTHEW S. MELAMED, ESQ.

19 555 12th Street, Suite 1600

20 Oakland, California 94607

21 415.445.4003

22 lweaver@bfalaw.com

23 adavis@bfalaw.com

24 mmelamed@bfalaw.com

25  
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1 APPEARANCES :

2  
3 FOR DEFENDANT FACEBOOK, INC.:

4 GIBSON, DUNN & CRUTCHER LLP

5 BY: RUSSELL H. FALCONER, ESQ.

6 LAURA C. MUMM, ESQ.

7 MATT BUONGIORNO, ESQ.

8 2001 Ross Avenue, Suite 2100

9 Dallas, Texas 75201

10 214.698.3100

11 rfalconer@gibsondunn.com

12 lmumm@gibsondunn.com

13 mbuongiorno@gibsondunn.com

14  
15 Also Remotely Present:

16 DANIEL GARRIE, SPECIAL MASTER

17 JAMS

18 555 W. 5th Street, 32nd Floor

19 Los Angeles, California 90013

20  
21 IAN CHEN, ESQ., Facebook, Inc.

22 SHAWNA HAYNES, Videographer

23  
24  
25  
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I N D E X

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JACKIE CHANG

EXAMINATION BY MR. LOESER

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1 THURSDAY, DECEMBER 16, 2021; 9:43 A.M.

2

3

4 THE VIDEOGRAPHER: Good morning. We are

5 going on the record at 9:43 a.m. on December 16th, 09:43

6 2021. Please note that the microphones may pick up 09:43

7 background noise, private conversations and 09:43

8 interference if unmuted. When muted, remember to 09:43

9 unmute to speak on the record. Audio and video 09:44

10 recording will continue to take place unless all 09:44

11 parties agree to go off the record. 09:44

12 This is media unit 1 of the video recorded 09:44

13 deposition of Jackie Chang taken by counsel for 09:44

14 plaintiff in the matter of In Re Facebook, Inc. 09:44

15 Consumer Privacy User Profile Litigation, all 09:44

16 related actions, filed in the United States 09:44

17 District Court, Northern District of California, 09:44

18 MDL No. 2843, case No. 18-md-02843-VC-JSC. 09:44

19 This deposition is being conducted via 09:44

20 Veritext Virtual Zoom Technology and all parties are 09:44

21 appearing remotely. My name is Shawna Haynes from 09:44

22 the firm Veritext Legal Solutions and I'm the 09:44

23 videographer. The court reporter is Janis Jennings 09:45

24 from the firm Veritext Legal Solutions. I am not 09:45

25 related to any party in this action, nor am I 09:45

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1 financially interested in the outcome. 09:45

2 Counsel and everyone attending remotely will 09:45

3 state their appearances and affiliations for the 09:45

4 record. If there are any objections to proceeding, 09:45

5 please state them at the time of your appearance 09:45

6 beginning with the noticing attorney. 09:45

7 MR. LOESER: Good morning. My name is Derek 09:45

8 Loeser for the plaintiffs from the firm of Keller 09:45

9 Rohrbach.

10 MS. WEAVER: Good morning. This is Lesley 09:45

11 Weaver from Bleichmar Fonti. With me is Matt 09:45

12 Melamed and Anne Davis, also of my firm, on behalf 09:45

13 of plaintiffs. Good morning, everybody. 09:45

14 MR. LOESER: And I also have Adele Daniel 09:45

15 from Keller Rohrbach. 09:45

16 MR. FALCONER: Good morning. This is Russ 09:46

17 Falconer, with Gibson Dunn & Crutcher, here on 09:46

18 behalf of the defendant and on behalf of the 09:46

19 witness. I'm here with my colleagues Laura Mumm and 09:46

20 Colin Davis, as well as Ian Chen from Facebook. 09:46

21 SPECIAL MASTER GARRIE: Last, Daniel Garrie 09:46

22 with JAMS. I'm the special master. 09:46

23 THE VIDEOGRAPHER: Okay. Anyone else? 09:46

24 Thank you. Will the court reporter please 09:46

25 swear in the witness. 09:46

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1 JACKIE CHANG,  
2 the witness herein, was sworn and  
3 testified as follows:  
4 09:46  
5 DEPOSITION REPORTER: Thank you. 09:46  
6 Please begin, Counsel. 09:46  
7  
8 EXAMINATION 09:46  
9 BY MR. LOESER: 09:46  
10 Q. Good morning, Miss Chang. Could you please 09:46  
11 state and spell your last name for the record? 09:46  
12 A. Chang, C-h-a-n-g. 09:46  
13 Q. Miss Chang, have you ever had your 09:46  
14 deposition taken before? 09:47  
15 A. No. 09:47  
16 Q. Okay. Well, there are some ground rules 09:47  
17 that make the -- that really are designed to make 09:47  
18 the record clear. The first is that we should try 09:47  
19 not to talk over each other. I will ask a question. 09:47  
20 I'll try to ask a clear question. If you don't 09:47  
21 understand the question, please ask me to restate 09:47  
22 it. And if you answer the question, I will assume 09:47  
23 that you understood the question. 09:47  
24 Is that okay? 09:47  
25 A. Yes. 09:47

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1 Q. And, again, we need to try not to speak at 09:47  
2 the same time because it tortures the court 09:47  
3 reporter. She can't take down our testimony if we 09:47  
4 are talking over each other. 09:47

5 If at any point you need to take a break, 09:47  
6 please let me know. I may finish asking a few 09:47  
7 questions but, of course, if you would like to take 09:47  
8 a break, we will make sure to allow you to take 09:47  
9 breaks. 09:47

10 During the testimony, your counsel may 09:47  
11 interpose objections and he has every right to do 09:47  
12 that. You should answer the question unless you're 09:47  
13 instructed not to do so by your counsel. 09:47

14 Do you understand that? 09:47

15 A. Yes. 09:48

16 Q. And you understand that your obligation here 09:48  
17 today is to testify honestly and truthfully? 09:48

18 A. Yes. 09:48

19 Q. And that you are under oath? 09:48

20 A. Yes. 09:48

21 Q. Your testimony today is going to cover the 09:48  
22 time period from 2007 through 2021. Do you 09:48  
23 understand that? 09:48

24 A. Yes. 09:48

25 Q. And that will be the time period that's 09:48

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1 covered unless I specifically state otherwise. 09:48

2 Okay? 09:48

3 A. Yes. 09:48

4 MR. LOESER: I'm going to show you what will 09:48

5 be marked as Exhibit No. 1 and that is your 09:48

6 deposition notice. And bear with us while we work 09:48

7 out the clunkiness of the platform here. We are 09:48

8 going to get the document up so you can see it, and 09:48

9 it will also be published via Veritext platform. So 09:48

10 it will be on a screen with the screen share, but 09:48

11 also you will have access to the document via the 09:48

12 Veritext platform. 09:48

13 (Exhibit 1 marked for identification.) 09:49

14 MR. LOESER: We need -- in the world of 09:49

15 Zoom, things always start interestingly. We need to 09:49

16 enable screen sharing so that we can do that. 09:49

17 THE VIDEOGRAPHER: It's enabled now. 09:49

18 BY MR. LOESER: 09:49

19 Q. Miss Chang, this is the deposition notice 09:49

20 that requires your attendance. Have you seen this 09:49

21 before? 09:49

22 A. No. 09:49

23 Q. Do you understand that you're testifying 09:49

24 today in response to a subpoena directing you to 09:49

25 appear to have your deposition taken? 09:49

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1 MR. FALCONER: Objection. Foundation. 09:49

2 Go ahead. 09:49

3 THE WITNESS: Sorry. Can you repeat the 09:49

4 question? 09:49

5 BY MR. LOESER: 09:49

6 Q. Sure. Do you understand that your testimony 09:49

7 today is being taken in response to a subpoena that 09:49

8 requires your -- a deposition notice that requires 09:49

9 your attendance? 09:50

10 A. Yes. 09:50

11 MR. LOESER: We can stop sharing that. 09:50

12 BY MR. LOESER: 09:50

13 Q. Miss Chang, what did you do to prepare today 09:50

14 for your deposition? 09:50

15 A. I met with counsel, Mr. Falconer and Miss 09:50

16 Mumm and Mr. Chen, and I can't remember the other 09:50

17 one. 09:50

18 Q. And how many times did you meet with them? 09:50

19 A. I met with them about three times. 09:50

20 Q. And for how much time each time? 09:50

21 A. About three hours. 09:50

22 Q. And did you speak to anyone at Facebook 09:50

23 about your testimony today? 09:50

24 A. No. I mean, Mr. -- Mr. Chen, the counsel 09:50

25 or... 09:51

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1 Q. Mr. Chen is in-house counsel at Facebook? 09:51

2 A. Yes. I think so. 09:51

3 Q. And did you review any documents to prepare 09:51

4 for your testimony today? 09:51

5 A. Yes. 09:51

6 Q. And what documents? Can you generally 09:51

7 describe the documents that you reviewed? 09:51

8 A. They appeared to be emails and an Excel 09:51

9 spreadsheet. 09:51

10 Q. And any other types of documents that you 09:51

11 reviewed? 09:51

12 A. Not that I recall. 09:51

13 Q. And how many documents would you say in 09:51

14 total did you review? 09:51

15 A. About maybe four or five. 09:51

16 Q. And were those documents selected by 09:51

17 counsel? 09:51

18 A. Yes. 09:51

19 Q. And did they refresh your recollection as to 09:51

20 any events during the time period that we're 09:52

21 covering today? 09:52

22 A. Sorry, can you -- sorry, in what sense? 09:52

23 Q. Did it remind you of events or occurrences 09:52

24 or whether you saw things you remembered from your 09:52

25 experience with them? 09:52

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1 A. Well, I saw the emails, but some of them I 09:52  
2 don't really recall too well since it was -- it was 09:52  
3 a little far back for me. 09:52

4 Q. And were these all emails that were -- where 09:52  
5 you were the sender or the recipient? 09:52

6 A. I believe I was cc'd on them. 09:52

7 MR. LOESER: And, Counsel, we would ask that 09:52  
8 you would, obviously, make sure that any material 09:52  
9 that Miss Chang reviewed to prepare for this 09:52  
10 deposition is produced or has been produced. Do you 09:52  
11 know -- 09:53

12 Counsel, do you know if those materials have 09:53  
13 all been produced? 09:53

14 MR. FALCONER: Yeah, they have. 09:53

15 BY MR. LOESER: 09:53

16 Q. And Miss Chang, did you review any of the 09:53  
17 pleadings or filings in this case to prepare today? 09:53

18 A. No. 09:53

19 Q. Miss Chang, what is your understanding of 09:53  
20 what this case is about? 09:53

21 MR. FALCONER: And, Miss Chang, I'm going to 09:53  
22 instruct you here. If the only understanding you 09:53  
23 have of what the case is about is something you 09:53  
24 learned in conversations with counsel, don't reveal 09:53  
25 what you learned in those conversations. 09:53

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1           If you have an independent understanding           09:53  
2   outside of conversations with counsel, you're free       09:53  
3   to share that.   09:53

4           THE WITNESS: Well, I believe everything I       09:53  
5   know is from counsel.                                     09:53

6   BY MR. LOESER:   09:53

7       Q.    Okay. You've never read anything about this 09:53  
8   case in the newspaper or online or anything like       09:53  
9   that?   09:53

10       A.   Not specifically, no.                           09:53

11           MR. LOESER: Counsel, I will just note for     09:53  
12   the record that two days ago, Tuesday, December       09:54  
13   14th, at 7:09 p.m. Pacific Time, Facebook made       09:54  
14   production of 1,807 documents. That production       09:54  
15   included 1,204 documents for which this deponent was   09:54  
16   a custodian, an additional 65 documents where this     09:54  
17   deponent was identified in the metadata or its           09:54  
18   directed text.

19           The produced documents from Miss Chang make   09:54  
20   up over 25 percent of all the custodial documents we   09:54  
21   have received for this deponent.                       09:54

22           And I will just note for the record that we   09:54  
23   reserve our right to recall this witness because of     09:54  
24   this late production.                                   09:54

25           MR. FALCONER: Great. We'll reserve all       09:54

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1 rights as well. 09:54

2 BY MR. LOESER: 09:54

3 Q. Miss Chang, what is your current position at 09:54

4 Facebook? 09:54

5 A. Director of academic partnerships. 09:54

6 Q. And how long have you had that position? 09:54

7 A. Since March. 09:54

8 Q. And who do you report to in that position? 09:54

9 A. Currently or... 09:54

10 Q. Yes, currently. 09:55

11 A. Alvin Bowles. 09:55

12 Q. And what is his position? 09:55

13 A. VP of business ecosystem partnerships. 09:55

14 Q. And who reports to you currently? 09:55

15 A. Brina Collins, Christina Fan and Rachel 09:55

16 Mersey. 09:55

17 Q. And what are each of their jobs? 09:55

18 A. Product programs, research of partnerships 09:55

19 and academic programs. 09:55

20 Q. Miss Chang, what's the total amount of time 09:55

21 you've worked for Facebook? 09:55

22 A. 14 years, a little over. 09:55

23 MR. LOESER: We're going to show you what 09:55

24 will be marked Exhibit 2, which is your LinkedIn 09:55

25 resume, and we'll screen share that as well. 09:55

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1 (Exhibit 2 marked for identification.) 09:56

2 BY MR. LOESER: 09:56

3 Q. Miss Chang, I just want to quickly walk 09:56

4 through your resume. I would like to start at the 09:56

5 bottom at your initial experience at Facebook, which 09:56

6 is user operations and the time period is April 2007 09:56

7 to September 2007. Is that accurate? 09:56

8 A. Yes. 09:56

9 Q. And what is it that you did in user 09:56

10 operations during that timeframe? 09:56

11 A. I answered user tickets which were emailed 09:56

12 questions. 09:56

13 Q. So questions from Facebook users? 09:56

14 A. Correct. 09:56

15 Q. And what are the kinds of questions that 09:56

16 Facebook users would ask you? 09:56

17 A. I got locked out of my account. How do I 09:56

18 use this feature? 09:56

19 Q. And were you asked any questions about user 09:56

20 privacy and concerns users had about what was 09:57

21 happening to their content and information? 09:57

22 A. I don't remember specifically. 09:57

23 Q. And after user operations, you were the 09:57

24 global accounts manager, national direct sales, and 09:57

25 that's from 2007 to 2010; is that correct? 09:57

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1 BY MR. LOESER: 09:58

2 Q. Yes. Explain to me what you did -- pick a 09:58

3 client, [REDACTED] [REDACTED] was one of your accounts that 09:58

4 you managed? 09:58

5 A. Yes. 09:58

6 Q. Okay. What did you do for [REDACTED] 09:58

7 specifically? 09:58

8 A. So I would [REDACTED] 09:58

9 [REDACTED] and they 09:58

10 would, you know, [REDACTED] 09:58

11 with [REDACTED]. And my team -- well, I didn't 09:59

12 have a team, but our group, [REDACTED] 09:59

13 [REDACTED]. 09:59

14 So at that time, we would have to [REDACTED] 09:59

15 [REDACTED]. So we were 09:59

16 there to [REDACTED] -- 09:59

17 [REDACTED] 09:59

18 [REDACTED]. 09:59

19 Q. And were you involved at all in figuring out 09:59

20 who -- what Facebook users would be exposed to that 09:59

21 ad campaign? 09:59

22 A. No. That's -- that would be outside of my 09:59

23 scope. I was focused on supporting the ad campaign. 09:59

24 Q. Okay. So who would be involved in figuring 09:59

25 out what users were exposed to the campaign? Is 09:59

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1      that how it would work, someone would advertise on      10:00  
2      the platform, that ad would not go to everybody on      10:00  
3      the platform, would it?      10:00  
4      A.    I'm not sure about the technical mechanics.      10:00  
5      I would imagine the product team would know.      10:00  
6      Q.    And was being a global accounts manager a      10:00  
7      promotion from user operations?      10:00  
8      A.    It was a lateral movement.      10:00  
9      Q.    And then from 2010 to 2014, you were the      10:00  
10     strategic partner manager, social commerce and      10:00  
11     developer platform. Tell me what you did there.      10:00  
12     A.    At that time, I would [REDACTED]      10:00  
13     [REDACTED]      10:00  
14     [REDACTED]      10:00  
15     [REDACTED] .      10:00  
16     Q.    And was that position a promotion from      10:01  
17     global accounts manager or a lateral?      10:01  
18     A.    Lateral.      10:01  
19     Q.    And how many different partners did you work      10:01  
20     with in your capacity as the manager?      10:01  
21     A.    I don't remember the specific number.      10:01  
22     Q.    Was it like hundreds, or a few, or what's      10:01  
23     your recollection?      10:01  
24     A.    Sorry. Over -- over what period of time?      10:01  
25     Q.    [Audio distortion] 2007 to...      10:01

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1 A. Sorry. 2010 to 2014 or... 10:01

2 Q. I'm sorry. 2010 to 2014, yeah. 10:01

3 A. I -- again, I don't remember the numbers 10:01

4 specifically, but could be in there, in maybe around 10:01

5 a hundred, I guess, over time. But not all managed 10:01

6 at once or anything. 10:02

7 Q. And, Miss Chang, what is social commerce and 10:02

8 developer platform? 10:02

9 A. Sorry. Can you -- can you repeat that? 10:02

10 Q. Yeah. I'm looking at your job title. It 10:02

11 includes the words "social commerce and developer 10:02

12 platform." Can you tell me what that is? 10:02

13 A. So the developer platform was something we 10:02

14 launched in 2007 which -- which provided APIs and 10:02

15 social plugins. And my group was focused on [REDACTED] [REDACTED]

16 [REDACTED], meaning, for example, [REDACTED] 10:02

17 [REDACTED] 10:02

18 [REDACTED] 10:02

19 [REDACTED], we would work with them there. 10:02

20 Q. And can you please define what a "[REDACTED] 10:03

21 [REDACTED]" is? 10:03

22 A. Sure. It's [REDACTED] 10:03

23 [REDACTED], for example. 10:03

24 Q. And are there other types of verticals other 10:03

25 than commerce verticals? 10:03

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1 Q. And was that a lateral move also? 10:05

2 A. It was a lateral move with a promotion. 10:05

3 Q. And what did you do in that position, 10:05

4 Miss Chang? 10:05

5 A. My focus was to work with our Internet.org 10:05

6 product team, which was focused on launching new 10:05

7 connectivity initiatives to help connect parts of 10:05

8 the world that didn't have Internet access. 10:05

9 My group was specifically focused on content 10:05

10 so that when we enabled access, you know, we would 10:05

11 be able to bring in relevant local content. 10:05

12 Q. And so this was not just in the 10:05

13 United States, but in other countries as well? 10:05

14 A. Correct. 10:05

15 Q. So you were involved in content in other 10:06

16 countries that was published on the Facebook 10:06

17 platform? 10:06

18 A. No, I wouldn't state it that way. Content 10:06

19 in the sense of websites that we would enable access 10:06

20 via the Free Basics or Internet.org service. So it 10:06

21 wasn't related to the developer platform. 10:06

22 Q. And what are "mobile inclusion 10:06

23 partnerships"? 10:06

24 A. Mobile inclusion partnerships consisted of 10:06

25 working with non-profits. So, for example, we would 10:06

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1 work with like the WHO, who would focus on creating 10:06  
2 content that was localized to help, you know, 10:06  
3 perhaps a -- perhaps a very specific region within 10:06  
4 Africa to drive awareness around malaria. 10:06

5 And so we would work with groups where there 10:07  
6 wasn't content available to be able to localize it 10:07  
7 and help address more of, like, you know, global 10:07  
8 health issues or localized issues. 10:07

9 Q. And did you work with foreign governments in 10:07  
10 this role as well? 10:07

11 A. I've interacted with them, but I didn't 10:07  
12 formally do business or anything with them. 10:07

13 Q. So your next position was head of business 10:07  
14 platform partnerships. Was that a promotion? It 10:07  
15 sounds like a promotion. 10:07

16 A. I would say it was a lateral movement with a 10:07  
17 promotion. 10:07

18 Q. And that was from 2017 through September of 10:07  
19 2019; is that correct? 10:07

20 A. Correct. 10:07

21 Q. And tell me what you did in that role. 10:07

22 A. Sure. Shifting from Internet.org, I moved 10:07  
23 over to focus around how we can enable more local 10:08  
24 and small businesses through -- through like 10:08  
25 features and offerings. 10:08

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1           So, for example, you know, a local           10:08  
2   restaurant, being able to help connect their --       10:08  
3   their online reservation system through Open Table   10:08  
4   so people can make reservations via their page.       10:08

5           Q.   And did you have particular clients or were   10:08  
6   you just overseeing the operation?                   10:08

7           A.   So I didn't work with clients because this   10:08  
8   was just platform offerings, so it was more of       10:08  
9   integration with APIs. This is different than       10:08  
10   advertising sales, which I haven't been in for a     10:08  
11   while.   10:09

12          Q.   Okay. And we'll get into questions about   10:09  
13   APIs.   10:09

14                But so were you helping design what APIs   10:09  
15   were made available to these partners on the       10:09  
16   platform?   10:09

17          A.   I did not design it. I'm not on the product 10:09  
18   team. I was mostly working with partners to help   10:09  
19   drive adoption.                                       10:09

20          Q.   And what did you do help drive adoption?   10:09

21          A.   I would meet with, for example, [REDACTED]   10:09

22   [REDACTED]   10:09

23   [REDACTED]   10:09

24   [REDACTED]   10:09

25   [REDACTED]   10:09

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1 [REDACTED] 10:09

2 [REDACTED]. 10:09

3 Q. And then moving to your -- the next job from 10:09

4 that is the job you currently hold; is that right, 10:09

5 director of platform product partnerships? 10:09

6 A. Correct. 10:10

7 Q. And that entry in your resume starts with 10:10

8 "Research Platform/Academic Partnerships/Developer 10:10

9 Platform & Business Platform." 10:10

10 Can you explain what all that means -- 10:10

11 [Simultaneous talking]

12 BY MR. LOESER?

13 Q. -- the tasks that you performed as the 10:10

14 director of platform product partnerships; is that

15 right? 10:10

16 DEPOSITION REPORTER: Excuse me. Can you 10:10

17 repeat your question, please. 10:10

18 BY MR. LOESER: 10:10

19 Q. Yes. Are -- the line in your resume that 10:10

20 starts, "Research Platform/Academic Partnerships,

21 Developer Platform & Business Platform," is that a 10:10

22 description of what it is that you are doing as the 10:10

23 director of platform product partnerships? 10:10

24 A. Correct. But I haven't updated it to my 10:10

25 most recent, which is now I'm fully focused on 10:10

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1 academic partnerships since March. 10:10

2 Q. Okay. Well, let's talk about what's in your 10:10

3 LinkedIn resume right now. 10:10

4 Can you please explain to me what it is that 10:11

5 you are doing as the director of platform product 10:11

6 partnerships before your current transition to just 10:11

7 dealing with academic partnerships? 10:11

8 A. Yes. I would work with product teams, 10:11

9 product teams that include business platform, which 10:11

10 is that, yeah, the example I gave you around Open 10:11

11 Table. I came back to support the developer 10:11

12 platform through its login service, and what that 10:11

13 meant was working with the product team to help them 10:11

14 with their go-to-market strategy so that we could 10:11

15 work with the actual partnerships' teams that were 10:11

16 in market to ensure that they had the right 10:11

17 materials to be able to connect and -- connect with 10:11

18 partners and, you know, help them to adopt these 10:11

19 products. 10:11

20 Q. What do you mean by the "right materials"? 10:11

21 A. "Right materials" meaning ensuring that they 10:12

22 had the right marketing language, meaning just 10:12

23 because you create something, if you can't talk 10:12

24 about it and market it correctly, people wouldn't be 10:12

25 able to understand it. 10:12

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1           So ensuring that partner managers who are on 10:12  
2     the ground would have the right information to 10:12  
3     connect with partners to help them understand what 10:12  
4     the product was. 10:12

5           Q.    And this describes your role as to research 10:12  
6     these different platforms. What did you do to 10:12  
7     research the platforms? 10:12

8           A.    So currently, I work with the Facebook Open 10:12  
9     Research and Transparency Team, where they've 10:12  
10    developed researcher APIs so that we can now enable 10:12  
11    privacy preserved measures to allow researchers to 10:12  
12    use that data for their studies. 10:12

13          Q.    And what are -- explain to me what 10:13  
14    privacy -- what was the description, of the 10:13  
15    measures? Privacy what? 10:13

16          A.    Privacy preserving measures. So I'm not the 10:13  
17    technical or product owner, so I'll specify that. 10:13  
18    But high level, you know, in ensuring that, you 10:13  
19    know, information is going through a virtual clean 10:13  
20    room, differential privacy applied. I am not an 10:13  
21    expert in this, so I don't know the details of how 10:13  
22    it all works. 10:13

23          Q.    And is this a new task or is this something 10:13  
24    that someone else did before you did it? 10:13

25          A.    I'm not sure I understand. 10:13

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1 Q. This privacy preserving structure, is that 10:13  
2 something new, or is that something that previously 10:13  
3 existed? 10:13

4 A. So that was created by the product team. 10:13  
5 What my team focused on is working with researchers 10:13  
6 to drive adoption for that product. So I can't 10:14  
7 speak to that -- the specifics of the history of 10:14  
8 that product. 10:14

9 Q. And how do researchers drive adoption of the 10:14  
10 product? 10:14

11 A. They're able to go through the Facebook Open 10:14  
12 Research and Transparency, or FORT, environment and, 10:14  
13 you know, they can apply for access. And we work 10:14  
14 with researchers when they apply for access and help 10:14  
15 get them set up so they can access those APIs -- or 10:14  
16 sorry, not APIs, datasets. 10:14

17 Q. Miss Chang, when did you transition to your 10:14  
18 current role? 10:14

19 A. March -- 10:14

20 Q. I'm sorry. Go ahead. 10:14

21 A. March 2021. 10:14

22 Q. Okay. And so did someone take over the task 10:14  
23 that you previously were responsible for? 10:14

24 A. Yes. It transferred over to another team. 10:15

25 Q. And what team was that? 10:15

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1           A.     The -- the acronym is PPM, but I'm trying to 10:15  
2     recall what the "PPM" stands for. Product partner 10:15  
3     marketing. 10:15

4           Q.     And who runs that team? 10:15

5           A.     Kelly Stonelake. 10:15

6           Q.     Have you worked with -- is Kelly a man or a 10:15  
7     woman? 10:15

8           A.     I believe she -- she's a she. 10:15

9           Q.     And had you worked with her before as the 10:15  
10    director of platform product partnerships? 10:15

11          A.     Yes. 10:15

12          Q.     Are there any other jobs or roles that you 10:15  
13    performed at Facebook that are not covered by the 10:15  
14    resume that we just went through? 10:16

15          A.     In what sense? Do you mean like -- sorry. 10:16

16          Q.     Did you have any other positions other than 10:16  
17    the ones that are listed there? 10:16

18          A.     No. 10:16

19          Q.     During the time that you have worked for 10:16  
20    Facebook, what software systems have you used to 10:16  
21    communicate with your colleagues? 10:16

22          A.     Sorry. I don't understand. 10:16

23          Q.     How did you communicate with your colleagues 10:16  
24    over the past 14 years at Facebook? 10:16

25          A.     Well, I think it depends on what year it 10:16

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1 was. When I first started, you know, we would 10:16  
2 have -- we would use Facebook Chat, and then we 10:16  
3 would -- we evolved to Workplace Chat, and then 10:16  
4 email. 10:16

5 Q. Okay. So you have described three different 10:16  
6 things. Are there any other -- I'm calling them 10:17  
7 "systems," you might call them something else. 10:17

8 Are there any other systems that you used to 10:17  
9 communicate with your colleagues? 10:17

10 A. Not that I recall. 10:17

11 Q. For example, did you use Slack? 10:17

12 A. No. Well, I haven't used Slack, but I can't 10:17  
13 speak for others. 10:17

14 Q. WIP, do you use WIP? 10:17

15 A. Yes. But I don't think that's a 10:17  
16 communication tool. More of a document tool. 10:17

17 Q. Okay. Let's expand -- have we covered all 10:17  
18 the different communication tools that you've used 10:17  
19 over the last 14 years? 10:17

20 A. To my understanding. I don't know if you 10:17  
21 would classify other types but, yes, email and work 10:17  
22 chat. 10:17

23 Q. I assume you talk to your employees; right, 10:17  
24 to your -- 10:17

25 A. Oh, yes. I guess, yeah, verbal. 10:17

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1 Q. And did you chat with them using your phone? 10:18

2 A. Through apps like Workplace. 10:18

3 Q. But not just using -- what kind of phone 10:18

4 have you had over the last 14 years? Is it an 10:18

5 iPhone? 10:18

6 A. An Apple iPhone. 10:18

7 Q. And did you use the chat feature on your 10:18

8 iPhone to communicate with others? 10:18

9 A. Sorry, which chat feature? 10:18

10 Q. On your iPhone -- is there a chat feature on 10:18

11 your iPhone? 10:18

12 A. I've used -- I've used the Workplace Chat 10:18

13 application. 10:18

14 Q. How about texting? Did you text on your 10:18

15 iPhone with your colleagues regarding work? 10:18

16 A. No. 10:18

17 Q. You never texted your colleagues with your 10:18

18 iPhone? 10:18

19 MR. FALCONER: Objection. Asked and 10:18

20 answered. 10:18

21 BY MR. LOESER: 10:18

22 Q. I'm sorry. You did not text your colleagues 10:18

23 for work-related matters on your iPhone -- 10:18

24 A. Oh, for work, no. 10:19

25 Q. Did you ever utilize a personal email 10:19

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1 account for work-related communications? 10:19

2 A. No. 10:19

3 Q. Did you ever send anything from your work 10:19

4 account to your home account to save it for any 10:19

5 particular reason? 10:19

6 A. I mean, I believe I've accidentally sent 10:19

7 something to my personal email just because it may 10:19

8 have auto-populated, but not intentionally. 10:19

9 Q. Okay. So you never thought this is worth 10:19

10 saving or this is important, I'm going to send it to 10:19

11 my home address? 10:19

12 A. No. 10:19

13 Q. Now, we went over your whole time and work 10:19

14 for Facebook. And it sounds like you have done some 10:19

15 work directly involving users; is that right? 10:19

16 That's where you started? 10:19

17 A. Yes, interacting with users in user 10:19

18 operation. 10:19

19 Q. And you also had a position where you 10:19

20 interacted with advertisers; is that right? 10:19

21 A. Correct. Working with advertisers in the 10:19

22 global national sales. 10:20

23 Q. And you also had positions where you 10:20

24 interacted with partners; is that right? 10:20

25 A. Correct. 10:20

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1 Q. Now, is there any other category of entities 10:20  
2 that utilize Facebook that you interacted with other 10:20  
3 than those? Does that cover everything, or are 10:20  
4 there other types of Facebook partners or actors? 10:20  
5 Do you understand what I'm asking? 10:20

6 A. Can you give an example? 10:20

7 Q. You've interacted with users, you've 10:20  
8 interacted with advertisers, you've interacted with 10:20  
9 partners. 10:20

10 Is there any other category you've 10:20  
11 interacted with or does that cover everything? 10:20

12 A. I think so. 10:20

13 Q. You think that covers everything? 10:20

14 A. Well, I don't know how you -- sorry, I'm 10:20  
15 trying to understand the full definition. But to my 10:20  
16 knowledge, yes. Yeah. 10:20

17 Q. And you clearly have a lot of experience 10:20  
18 with working with partners; is that right? 10:20

19 A. Correct. 10:20

20 Q. Have you been involved in helping form any 10:21  
21 policies or procedures at Facebook? 10:21

22 A. In what sense? 10:21

23 Q. In any of the different types of users, 10:21  
24 advertisers, partners, were you involved in helping 10:21  
25 create policy for any of those groups? 10:21

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1 A. No. 10:21

2 Q. Do you have particular things that you would 10:21

3 consider major accomplishments for yourself at 10:21

4 Facebook? 10:21

5 A. I would say the time here in itself and, you 10:21

6 know, working with -- you know, working with 10:21

7 partners on new innovative things, you know, such as 10:21

8 the [REDACTED] that was the first of 10:21

9 its kind. Working with [REDACTED] 10:22

10 first of its kind in terms of [REDACTED] 10:22

11 [REDACTED]. Working on Internet.org, enabling, you 10:22

12 know, new access in different regions of the world. 10:22

13 And then now working with researchers trying to 10:22

14 enable that -- that area too. 10:22

15 Q. And do you feel like you have been able to 10:22

16 influence how Facebook does business with its 10:22

17 partners? 10:22

18 A. In what sense? 10:22

19 Q. In the sense of evolving or changing their 10:22

20 practices or innovating their practices. 10:22

21 A. I guess it's a little broad, but in the 10:22

22 sense that I'm able to help the partners achieve the 10:22

23 goals where it makes sense, yes. 10:22

24 Q. How is the term "partner" used by Facebook? 10:22

25 A. Partner is someone that Facebook is working 10:23

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1 with. It doesn't necessarily mean that there's a 10:23  
2 monetary exchange, but someone that we would 10:23  
3 collaborate with for a larger goal or objective. 10:23

4 Q. And sometimes there's a monetary exchange 10:23  
5 with partners? 10:23

6 A. Advertisers, for example, would be a 10:23  
7 partner. 10:23

8 Q. Are there other types of partners for which 10:23  
9 there is a monetary exchange? 10:23

10 A. I don't know in full depth. It's possible. 10:23

11 Q. What do you mean by "monetary exchange"? 10:23

12 A. I guess that's what I meant by I don't know 10:23  
13 fully. So my understanding in terms of advertising, 10:23  
14 like if you buy advertising, in that sense. 10:23

15 Q. So people spending money -- paying Facebook 10:23  
16 money; right? Is that what advertisers do? 10:23

17 A. Yeah. Not people, but advertisers. 10:24

18 Q. Okay. And are there partners where Facebook 10:24  
19 pays the partners money? 10:24

20 A. I imagine there is, but I don't work on that 10:24  
21 directly. 10:24

22 Q. But can you identify any of those types of 10:24  
23 partners? 10:24

24 A. No, I don't know specifically. 10:24

25 Q. What are the different types of partners 10:24

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1      that you're aware of?      10:24

2            A.    I would say the ones you've listed,      10:24

3      advertisers -- advertisers, developers, anyone that      10:24

4      we worked with in that sense.      10:24

5            Q.    So you mentioned [REDACTED], for example, and --      10:24

6            A.    Yeah.      10:24

7            Q.    What type of partner is [REDACTED]?      10:24

8            A.    I guess we don't have like special labels.      10:25

9      They -- they're just a partner that we would work      10:25

10      with, someone who's used our products in different      10:25

11      ways; for example, [REDACTED]      10:25

12      [REDACTED]. They've used [REDACTED]. So in that sense,      10:25

13      they're a partner.      10:25

14            Q.    So partners can be advertisers; right?      10:25

15            A.    Yes, correct.      10:25

16            Q.    And can you think of -- you mentioned      10:25

17      [REDACTED], for example. That's something -- you put      10:25

18      that in the same kind of general category as [REDACTED].      10:25

19            And is that [REDACTED]      10:25

20      [REDACTED]?      10:25

21            A.    So, again, I think [REDACTED]      10:25

22      [REDACTED]. But in my experience [REDACTED]      10:25

23      [REDACTED]      10:25

24      [REDACTED], you know,      10:25

25      between that time.      10:25

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1 And then I also worked with them when I 10:26  
2 moved over to developer platform when they 10:26  
3 integrated the Like button plugin. 10:26  
4 Q. So when you're [REDACTED] 10:26  
5 [REDACTED] is the -- is [REDACTED] 10:26  
6 [REDACTED] 10:26  
7 [REDACTED]? 10:26  
8 A. I don't -- I'm not sure I understand. 10:26  
9 Q. Well, in [REDACTED] 10:26  
10 [REDACTED] 10:26  
11 [REDACTED]? 10:26  
12 A. I don't know -- sorry. 10:26  
13 MR. FALCONER: Objection. Form. 10:26  
14 THE WITNESS: Sorry.  
15 MR. FALCONER: I -- objection. Form. 10:26  
16 Go ahead. 10:26  
17 BY MR. LOESER:  
18 Q. Do you have --  
19 A. I don't know. 10:26  
20 Q. Yeah. And I mentioned [REDACTED] only because 10:26  
21 you mentioned it. 10:26  
22 So when you have [REDACTED] 10:26  
23 [REDACTED] 10:26  
24 [REDACTED]? 10:26  
25 A. So I don't -- oh -- 10:26

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1 MR. FALCONER: Sorry. Objection. Form. 10:26

2 Go ahead. 10:27

3 THE WITNESS: So I don't know. [REDACTED] 10:27

4 [REDACTED] 10:27

5 [REDACTED], so I don't -- I can't speak 10:27

6 for them holistically because I only worked with 10:27

7 them at that moment in time. 10:27

8 BY MR. LOESER: 10:27

9 Q. You worked with [REDACTED] 10:27

10 [REDACTED] 10:27

11 [REDACTED]; is that right? 10:27

12 A. Sorry. It's a little generalized. What do 10:27

13 you mean? 10:27

14 Q. Well, again, did [REDACTED] 10:27

15 [REDACTED]? 10:27

16 A. So at that time I worked with them, I worked 10:27

17 specifically on [REDACTED]. 10:27

18 Q. How about [REDACTED]? Did [REDACTED] 10:27

19 [REDACTED]? 10:27

20 A. To my knowledge, when I worked with them, 10:27

21 [REDACTED] 10:27

22 [REDACTED], they 10:28

23 were able to [REDACTED] if 10:28

24 they opted into that. 10:28

25 Q. Okay. So [REDACTED], was able to 10:28

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1 [REDACTED] 10:28

2 [REDACTED]; right? 10:28

3 A. Yes. 10:28

4 Q. And [REDACTED] 10:28

5 [REDACTED]; is that right? 10:28

6 MR. FALCONER: Objection. Form. 10:28

7 Go ahead. 10:28

8 THE WITNESS: Oh, yes, [REDACTED] 10:28

9 [REDACTED] but I don't know if [REDACTED] 10:28

10 [REDACTED], but... 10:28

11 BY MR. LOESER: 10:28

12 Q. Are app developers considered partners? 10:28

13 A. Yes, if -- yes. 10:28

14 Q. And do you know what "data brokers" are? 10:28

15 A. Like generally or... 10:28

16 Q. Yes, generally. 10:29

17 A. Yes. 10:29

18 Q. What are data brokers? 10:29

19 A. They are an entity that may facilitate the 10:29

20 trade of data. 10:29

21 Q. Okay. And they're considered partners as 10:29

22 well at Facebook? 10:29

23 A. I don't know. I don't work with data 10:29

24 brokers. 10:29

25 Q. Do you know -- you mentioned the monetary 10:29

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1 exchange aspect. Do you know if there was a 10:29  
2 monetary exchange between Facebook and data brokers? 10:29  
3 A. I don't know. 10:29  
4 Q. Are advertisers sometimes also app 10:29  
5 developers? 10:29  
6 A. Yes. 10:29  
7 Q. Miss Chang, why does Facebook have partners? 10:29  
8 A. I think that depends in terms of -- so 10:29  
9 Facebook is hard to generalize as one entity. It's 10:30  
10 made up of, you know, different groups trying to 10:30  
11 drive different goals. And I would say related to 10:30  
12 different goals, they may partner to help achieve 10:30  
13 that goal. So I can't speak to what every 10:30  
14 individual team's goals are. 10:30  
15 Q. So let's just think in terms of the partners 10:30  
16 with which you've been involved. 10:30  
17 A. Okay. 10:30  
18 Q. Why does Facebook have those partnerships? 10:30  
19 DEPOSITION REPORTER: Excuse me. I lost the 10:30  
20 last word. "Why does Facebook..." 10:30  
21 BY MR. LOESER: 10:30  
22 Q. -- have those partnerships? 10:30  
23 A. So, for example, when I worked with [REDACTED] 10:30  
24 [REDACTED], you know, there was an -- at the 10:30  
25 time, we wanted to be able to show [REDACTED] 10:30

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1 [REDACTED] 10:31  
2 [REDACTED] 10:31  
3 [REDACTED], meaning like [REDACTED] 10:31  
4 [REDACTED]. And so 10:31  
5 something innovative like [REDACTED] 10:31  
6 [REDACTED], [REDACTED] 10:31  
7 [REDACTED] 10:31  
8 [REDACTED]. 10:31  
9 And so for that specific example, you know, 10:31  
10 the goal was [REDACTED] -- [REDACTED] 10:31  
11 [REDACTED] 10:31  
12 [REDACTED]. 10:31  
13 Q. And wasn't another purpose for Facebook to 10:31  
14 collect information about the user for its own use? 10:31  
15 A. I don't know. That would be a bit outside 10:31  
16 of my -- my specific role. 10:31  
17 Q. Facebook shared user content information 10:32  
18 with partners; is that right? 10:32  
19 A. In what sense? 10:32  
20 Q. Well, I'm asking you, in your role involved 10:32  
21 in all the capacities dealing with partners, was 10:32  
22 there a sharing of user content information -- 10:32  
23 MR. FALCONER: Objection. Form. 10:32  
24 THE WITNESS: So we would have public APIs, 10:32  
25 where if people consented, you know, I believe they 10:32

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1 would be able to provide that data to the 10:32  
2 application developer. 10:32  
3 BY MR. LOESER: 10:32  
4 Q. Okay. And so through the API, a partner 10:32  
5 could obtain user content information about users; 10:32  
6 is that right? 10:32  
7 MR. FALCONER: Objection. Form. 10:32  
8 THE WITNESS: I think that depends. I 10:32  
9 wouldn't generalize it to that because it would be 10:32  
10 dependent on what the developer created and what 10:33  
11 they were approved to use. 10:33  
12 BY MR. LOESER: 10:33  
13 Q. Okay. But there were partners that were 10:33  
14 approved to have access to various API permissions; 10:33  
15 is that right? 10:33  
16 MR. FALCONER: Objection. Form. 10:33  
17 THE WITNESS: I imagine so. 10:33  
18 BY MR. LOESER: 10:33  
19 Q. And don't you, in fact, know so from your -- 10:33  
20 from the work you did with partners? 10:33  
21 MR. FALCONER: Objection. Form and asked 10:33  
22 and answered. 10:33  
23 THE WITNESS: So for specific partners for 10:33  
24 specific permissions, yes, but I thought you were 10:33  
25 trying to speak to it more generally, which I didn't 10:33

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1 manage generally. There was an operations team for 10:33  
2 that. 10:33  
3 BY MR. LOESER: 10:33  
4 Q. And when Facebook shares -- when Facebook 10:33  
5 shares user information with a third party, what 10:33  
6 does that mean to you? 10:33  
7 A. I think it depends on what specific -- what 10:33  
8 specific group. So in the context of my experience 10:34  
9 on the developer platform, it would be through the 10:34  
10 developer APIs and the permissions there. 10:34  
11 Q. Okay. And I just want to make sure I 10:34  
12 understand how you use the terminology. 10:34  
13 Through the APIs -- APIs are a way for a 10:34  
14 third party that has permission to obtain various 10:34  
15 categories of information that Facebook has 10:34  
16 collected about the user; is that right? 10:34  
17 MR. FALCONER: Objection. Form. 10:34  
18 Go ahead. 10:34  
19 THE WITNESS: Sorry. Can you restate that? 10:34  
20 MR. LOESER: Why don't we just repeat the 10:34  
21 question. Would you read the question back, please, 10:34  
22 Miss Jennings. 10:34  
23 (Record read as follows: 10:34  
24 "Q. Okay. And I just want to make sure 10:34  
25 I understand how you use the terminology. 10:34

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1 Through the APIs -- APIs are a way for a 10:34  
2 third party that has permission to obtain 10:34  
3 various categories of information that 10:34  
4 Facebook has collected about the user; 10:34  
5 is that right?")

6 THE WITNESS: No. 10:35

7 MR. FALCONER: Same objection. 10:35

8 BY MR. LOESER: 10:35

9 Q. So APIs are a way for a third party to 10:35  
10 obtain various categories of information that 10:35  
11 Facebook has collected about a user; correct? 10:35

12 A. Yes. It's a -- it's a vehicle, but I 10:35  
13 wouldn't necessarily say -- again, I'm not a 10:35  
14 technical person. I don't know if that's all 10:35  
15 technically how it's done, but to my understanding, 10:35  
16 it sounds right. 10:35

17 Q. Are you familiar with the concept at 10:35  
18 Facebook of reciprocity? 10:35

19 A. Yes. 10:35

20 MR. FALCONER: Objection. Form. 10:35

21 Go ahead. 10:35

22 BY MR. LOESER: 10:35

23 Q. Can you explain to me how Facebook uses the 10:35  
24 term reciprocity with -- particularly with respect 10:35  
25 to partners? 10:36

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1 MR. FALCONER: Same objection. 10:36

2 THE WITNESS: My understanding of 10:36

3 reciprocity is a value exchange. 10:36

4 BY MR. LOESER: 10:36

5 Q. And explain what you mean by that. 10:36

6 A. "Value" meaning -- and it doesn't 10:36

7 necessarily mean monetary. So, you know, going back 10:36

8 to partnerships, ensuring that if we're going to 10:36

9 partnerships, there's value in that experience. 10:36

10 So, for example, in working with [REDACTED], the 10:36

11 [REDACTED] 10:36

12 [REDACTED] 10:36

13 [REDACTED] 10:36

14 [REDACTED]. 10:36

15 Q. So is value another way of saying 10:36

16 information? So when there's value -- when there is 10:36

17 reciprocity with a partner, that means that Facebook 10:36

18 is giving that partner some information about users, 10:36

19 and Facebook is obtaining from that partner some 10:37

20 information about users; is that right? 10:37

21 A. Not to my understanding. 10:37

22 Q. It's not your understanding that in exchange 10:37

23 for providing information, Facebook gets back 10:37

24 information? 10:37

25 A. Well, I think it's dependent. So when I was 10:37

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1 talking about the value exchange, it doesn't have to 10:37  
2 be information. Value can be in the sense of like 10:37  
3 experience. So if the experience is making the user 10:37  
4 experience better, meaning it brings like delight to 10:37  
5 a user, then that's also an exchange in value. 10:37

6 Q. However, it is sometimes an exchange of 10:37  
7 information; is that correct? 10:37

8 A. Yes. It could be. 10:37

9 Q. Give me an example of [REDACTED] 10:37  
10 [REDACTED], for example, [REDACTED]. 10:37  
11 What would [REDACTED]? 10:37

12 A. So for example, with the [REDACTED], 10:37  
13 [REDACTED] would be the [REDACTED] 10:37  
14 [REDACTED]. 10:37  
15 So if they are asking for, [REDACTED] 10:38  
16 [REDACTED] 10:38  
17 [REDACTED] our hope is that [REDACTED] 10:38  
18 [REDACTED], but also to 10:38  
19 [REDACTED], [REDACTED] 10:38  
20 [REDACTED] 10:38  
21 [REDACTED]. 10:38

22 Q. Okay. And what does Facebook [REDACTED] 10:38  
23 [REDACTED]? 10:38

24 A. I don't know. 10:38

25 Q. Do you know anything about how it studies -- 10:38

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1 Facebook studies that information or analyzes it? 10:38

2 A. No. That would be outside my scope. 10:38

3 Q. Do you know if, in fact, information that is 10:38

4 published back is studied and analyzed by Facebook? 10:38

5 A. I don't know. 10:38

6 Q. You don't know if that happens, or you just 10:38

7 don't know anything about it? 10:38

8 A. I just don't know. It is outside my scope 10:38

9 so I can't really speak to it. 10:38

10 Q. And Miss Chang, you worked with partners 10:38

11 with whom there was reciprocity; is that right? 10:39

12 A. In what sense? 10:39

13 MR. FALCONER: Objection to form. 10:39

14 BY MR. LOESER: 10:39

15 Q. In the sense that we have just been 10:39

16 discussing, [REDACTED] -- 10:39

17 [REDACTED] 10:39

18 [REDACTED]. 10:39

19 A. Yes. So if [REDACTED] is an example, we worked 10:39

20 [REDACTED], but I wouldn't say 10:39

21 [REDACTED]. 10:39

22 Q. Right. 10:39

23 A. It's more of a concept. 10:39

24 Q. It's an important concept to Facebook; 10:39

25 right? 10:39

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1	A. I don't know.	10:39
2	Q. Were you involved in making sure that there	10:39
3	was reciprocity with partners with whom you worked?	10:39
4	A. I don't know in the sense that I -- I'm not	10:39
5	sure I understand.	10:39
6	Q. Well, did you ever, for example, communicate	10:39
7	to your colleagues that some interaction with a	10:39
8	partner was positive because there was progress with	10:40
9	reciprocity?	10:40
10	A. I'm not sure I understand. So when I would	10:40
11	work with a partner, I would try to ensure that I'm	10:40
12	always representing the voice of a partner	10:40
13	holistically, meaning the different ways that we're	10:40
14	working with them, the things that would impact	10:40
15	their business. Not necessarily in the scope of	10:40
16	reciprocity.	10:40
17	Q. But you would also want to make sure that if	10:40
18	Facebook was giving content information to the	10:40
19	partner, that Facebook was getting back some	10:40
20	information; isn't that correct?	10:40
21	A. I didn't regulate that. Well, I guess I'm	10:40
22	having a hard time understanding. Like I don't	10:40
23	regulate that.	10:40
24	Q. You don't recall any examples of where you	10:40
25	were endeavoring to encourage reciprocity?	10:41

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1 MR. FALCONER: Same objection. 10:42

2 THE WITNESS: Again, I don't know. And I 10:42

3 guess it's kind of hard to generalize it, so I don't 10:42

4 know. 10:42

5 BY MR. LOESER: 10:42

6 Q. So is the value of a partner based on how 10:42

7 much user content information Facebook obtains from 10:42

8 a partner? 10:42

9 MR. FALCONER: Objection. Form. And asked 10:42

10 and answered. 10:42

11 THE WITNESS: I don't know. 10:42

12 BY MR. LOESER: 10:42

13 Q. Miss Chang, are some partners considered 10:43

14 vendors? 10:43

15 A. Yes. Yeah. 10:43

16 Q. So what would a "vendor" be? 10:43

17 A. A vendor would be -- sorry. A vendor would 10:43

18 be someone we buy services from. 10:43

19 Q. Okay. And can you think of any examples of 10:43

20 services that Facebook buys? 10:43

21 A. Yes. Like a [REDACTED] 10:43

22 [REDACTED] 10:43

23 [REDACTED]. 10:43

24 Q. So they would provide a service? That 10:43

25 particular type of partner would provide a service 10:43

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1 to Facebook? 10:43

2 A. That partner in the advertising capacity 10:43

3 could also be a vendor. 10:43

4 Q. And a lot of partner arrangements, the 10:43

5 information the partner obtains from Facebook is 10:44

6 used to support that partner's business; is that 10:44

7 right? 10:44

8 MR. FALCONER: Objection. Form. 10:44

9 THE WITNESS: Sorry. I don't understand. 10:44

10 Can you -- can you say it another way or... 10:44

11 BY MR. LOESER: 10:44

12 Q. What is your understanding of what a partner 10:44

13 does when it obtains user content information from 10:44

14 Facebook? 10:44

15 MR. FALCONER: Objection. Form. 10:44

16 THE WITNESS: I don't know. If there's 10:44

17 something more specific... 10:44

18 BY MR. LOESER: 10:44

19 Q. Do you know anything about how Facebook uses 10:44

20 user content information in its advertising 10:44

21 business? 10:44

22 A. No, not technically. 10:44

23 Q. Do you know anything about how Facebook 10:44

24 monetizes information that it obtains from its 10:45

25 partners? 10:45

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1 MR. FALCONER: Objection. Form. 10:45

2 Go ahead. 10:45

3 THE WITNESS: Not specifically. 10:45

4 BY MR. LOESER: 10:45

5 Q. Well, generally, do you know? 10:45

6 A. No. I don't -- well, I don't know in the 10:45

7 capacity that -- sorry, if you can give me an 10:45

8 example. 10:45

9 Q. Was that something that you ever discussed 10:45

10 with your colleagues, how Facebook monetizes 10:45

11 information? 10:45

12 A. No, not that I -- that I recall. 10:45

13 Q. Do you know what group at Facebook managed 10:45

14 the relationship with data brokers? 10:45

15 A. No. 10:45

16 Q. Do you know if data brokers were ever app 10:45

17 developers for Facebook? 10:46

18 A. I don't know. 10:46

19 Q. Do you know if data brokers were ever 10:46

20 advertisers for Facebook? 10:46

21 A. I don't know. 10:46

22 MR. LOESER: I will show you what we will 10:46

23 mark as Exhibit 3. We will screen share that as 10:46

24 well. 10:46

25 (Exhibit 3 marked for identification.) 10:46

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1 BY MR. LOESER: 10:46

2 Q. This is an email from -- and I'm not sure 10:46

3 I'm saying this name right. Ime Archibong. Do you 10:46

4 know who that is? 10:46

5 A. Yes, Ime Archibong. 10:46

6 Q. Ime Archibong. What is Ime Archibong's job? 10:46

7 A. At this time or... 10:46

8 Q. Yes. 10:46

9 A. I believe he was the director of platform 10:47

10 partnerships. 10:47

11 Q. Okay. So someone who had the job before 10:47

12 you? 10:47

13 A. I didn't have that job. 10:47

14 Q. So the Exhibit 3 is an email from Ime 10:47

15 Archibong to you, dated September 30th, 2013; right? 10:47

16 A. Sorry. Can you repeat that? I was also 10:47

17 reading the email. 10:47

18 Q. I'm just identifying this exhibit for the 10:47

19 record. And it is an email from Ime Archibong to 10:47

20 you dated September 30th, 2013; is that correct? 10:47

21 A. Yes, correct. 10:47

22 Q. And do you see the subject line on that 10:47

23 email? 10:47

24 A. Yes. 10:47

25 Q. And it says, "Re: Product Partnerships & 10:47

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1 BD: Bi-weekly Update"; is that right? 10:47

2 A. Yes. 10:47

3 Q. Now, is this -- this is an update regarding 10:47

4 a variety of actions. Are you familiar with these 10:48

5 updates? Was this something that was regularly 10:48

6 circulated? 10:48

7 A. May I -- may I read this first? 10:48

8 Q. [Inaudible]

9 A. Okay. Sorry. 10:48

10 Q. Down the email string, this is -- you 10:48

11 provided Ime with what you describe as an "updated 10:48

12 structure for goals and progress." Do you see that? 10:48

13 A. Correct. 10:48

14 Q. And is this something that you regularly did 10:48

15 updating progress on a variety of goals, partnership 10:48

16 goals? 10:49

17 A. Yes. 10:49

18 Q. And you provided a progress report with 10:49

19 that? 10:49

20 A. Yes. 10:49

21 Q. Okay. Can you look at the first entry in 10:49

22 your updates. It says, "[REDACTED] [REDACTED]

[REDACTED] [REDACTED]" 10:49

24 What does "H2'13" mean? 10:49

25 A. Second half 2013. 10:49

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1 Q. Okay. And what's the first entry? If you 10:49  
2 could just read the first entry under that update. 10:49  
3 A. "[REDACTED]" 10:49  
4 Q. Yeah. Under "[REDACTED]," what does that say? 10:49  
5 A. "[REDACTED]." 10:49  
6 Q. Can you read the rest of that line? 10:49  
7 A. "[REDACTED]" 10:49  
8 Q. Okay. What is that referring to? 10:49  
9 A. That's referring to [REDACTED] 10:49  
10 [REDACTED]. 10:49  
11 Q. Okay. And so does that suggest that 10:49  
12 [REDACTED]? 10:49  
13 A. Yes. 10:50  
14 Q. Okay. And then it [REDACTED] 10:50  
15 [REDACTED] is that right, [REDACTED], 10:50  
16 [REDACTED]? 10:50  
17 A. Yes. 10:50  
18 Q. And do you know if [REDACTED] 10:50  
19 [REDACTED]? 10:50  
20 A. I don't remember all of them. 10:50  
21 Q. Okay. And tell me what specifically [REDACTED] 10:50  
22 [REDACTED]? 10:50  
23 A. From what I recall, they were [REDACTED] 10:50  
24 [REDACTED]. So, for example, [REDACTED] 10:50  
25 [REDACTED] 10:50

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1 [REDACTED]. So like if 10:50

2 [REDACTED] 10:51

3 [REDACTED] 10:51

4 [REDACTED]. 10:51

5 Q. Okay. So that's an example of [REDACTED] 10:51

6 [REDACTED]; is that right? 10:51

7 A. Yes. 10:51

8 Q. And can you think of other examples of [REDACTED] 10:51

9 [REDACTED]? 10:51

10 A. I -- I only probably know more specifically 10:51

11 this. 10:51

12 Q. What about data that was sold by Facebook? 10:51

13 Were you involved at all with that? 10:51

14 A. No. 10:51

15 Q. And are you aware of any data that was sold 10:51

16 by Facebook? 10:51

17 A. Not to my knowledge, no. 10:51

18 MR. FALCONER: Derek, can we take a quick 10:52

19 break whenever you are done with this document? 10:52

20 MR. LOESER: Sure. Now is fine. 10:52

21 MR. FALCONER: All right. 10:52

22 MR. LOESER: You want 10 minutes? 15 10:52

23 minutes? 10:52

24 MR. FALCONER: Yeah. 10:52

25 THE VIDEOGRAPHER: This marks the end of 10:52

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1 media No. 1 in the deposition of Jackie Chang. 10:52

2 Going off the record. The time is 10:52. 10:52

3 (Off the record.) 10:52

4 THE VIDEOGRAPHER: This marks the beginning 11:14

5 of media No. 2 in the deposition of Jackie Chang. 11:14

6 We are back on the record. The time is 11:14. 11:14

7 BY MR. LOESER: 11:14

8 Q. Miss Chang, Facebook collects content and 11:14

9 information about its users from its partners and 11:14

10 uses that information in its advertising business; 11:14

11 is that correct? 11:14

12 MR. FALCONER: Objection. Form. 11:14

13 THE WITNESS: I can't speak to that broadly, 11:14

14 meaning I don't know the technical specifics to be 11:14

15 able to support that statement. 11:15

16 BY MR. LOESER: 11:15

17 Q. But do you know that generally to be the 11:15

18 case, Miss Chang? 11:15

19 A. No. I -- I don't really feel comfortable 11:15

20 answering because I don't know. 11:15

21 Q. Do you know how Facebook makes money? 11:15

22 A. My understanding is advertising. 11:15

23 Q. And do you know whether advertising collects 11:15

24 and uses user content and information? 11:15

25 MR. FALCONER: Objection. Form. 11:15

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1 THE WITNESS: I don't know, meaning I don't 11:15  
2 understand the product mechanics around that. 11:15  
3 BY MR. LOESER: 11:15  
4 Q. What do you understand about the advertising 11:15  
5 business at Facebook? 11:15  
6 A. Not much since I haven't worked on it since 11:15  
7 2010. 11:15  
8 Q. Do you know what portion of Facebook's 11:15  
9 revenue comes from its advertising business? 11:15  
10 A. Not specifically. 11:15  
11 Q. Do you have any idea at all? 11:15  
12 A. I think a good portion. 11:16  
13 Q. And does the advertising business utilize in 11:16  
14 any way, as far as you understand it, content and 11:16  
15 information that Facebook collects from its 11:16  
16 partners? 11:16  
17 MR. FALCONER: Objection. Form. 11:16  
18 THE WITNESS: Again, I don't know enough 11:16  
19 about the technical specifics to make that 11:16  
20 assertion. I don't know. 11:16  
21 BY MR. LOESER: 11:16  
22 Q. Well, I'm not asking about the technical 11:16  
23 specifics, just the general concept. Is that 11:16  
24 something you understand? 11:16  
25 A. I don't know. 11:16

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1 Q. Miss Chang, are people who create apps for 11:16  
2 Facebook called "developers"? 11:16  
3 A. Yes. 11:16  
4 Q. Are there other types of developers? 11:16  
5 A. I only know of app developers. 11:16  
6 Q. And we mentioned APIs before, but can you 11:17  
7 please just explain what "APIs" are. 11:17  
8 A. Application programming interface. It's a 11:17  
9 way for, you know, two -- two services to connect 11:17  
10 and speak to each other. 11:17  
11 Q. And how does Facebook use APIs with regard 11:17  
12 to user content and information? 11:17  
13 A. I'm not sure I understand the question. 11:17  
14 Q. Do you understand how Facebook uses APIs at 11:17  
15 all? 11:17  
16 A. Well, Facebook doesn't use the APIs. The 11:17  
17 developer -- so, sorry, can you be a little more 11:17  
18 specific? 11:17  
19 Q. Yeah. How do APIs work at Facebook on its 11:17  
20 platform? 11:17  
21 A. I think that depends because APIs can be 11:17  
22 used in a lot of different cases. Are you speaking 11:17  
23 to developer platform or? 11:18  
24 Q. Yes. How are -- how do third parties access 11:18  
25 user content information through APIs? 11:18

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1           A.     So they can go through our developer           11:18  
2     platform and go through the process of approvals and   11:18  
3     submitting their app to access APIs.                   11:18

4           Q.     Explain that process in as much detail as   11:18  
5     you can.   11:18

6           A.     Unfortunately, I can't. I don't work on the 11:18  
7     operations side. So generally, we prefer them to go   11:18  
8     through the flow, and that flow is managed by -- on   11:18  
9     the product and operation side. So I can't speak to   11:18  
10    the exact process.                                       11:18

11          Q.     Okay. You are familiar with the different   11:18  
12    sorts of APIs that Facebook provides for its           11:18  
13    third-party access to --                               11:18

14          A.     Sorry, you broke up. Can you say that     11:18  
15    again?   11:18

16          Q.     Have you ever looked at a list of APIs that 11:18  
17    are -- that app developers can use if they have       11:19  
18    permission to do so?                                   11:19

19          A.     I have looked at developer.Facebook.com,   11:19  
20    which has a list of APIs.                               11:19

21          Q.     Okay. And are you familiar with any of    11:19  
22    those APIs?   11:19

23          A.     I don't -- probably not, since it's been a   11:19  
24    couple years since I've worked on that directly.       11:19

25          Q.     For example, are you familiar with the     11:19

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1 friends permission APIs? 11:19

2 A. I know what the name is, but I don't know 11:19

3 like the specifics around it. 11:19

4 Q. What do you know about it? 11:19

5 A. I've heard of it, like I've seen the name 11:19

6 like in emails, but I don't remember what it exactly 11:19

7 does and the technical specifics of it. 11:19

8 Q. Do you know what information the friends API 11:19

9 permissions allow a third party to access? 11:20

10 A. I don't recall specifically. 11:20

11 Q. In order to have access to APIs, what does a 11:20

12 developer need to do? 11:20

13 A. So I think that depends. Are you talking 11:20

14 about just the developer platform workflow or... 11:20

15 Q. We can start there, yeah. 11:20

16 A. Sure. On developer platform, they would go 11:20

17 to developer.Facebook.com, go through the documents 11:20

18 and, generally, they would follow the workflow for 11:20

19 approval. 11:20

20 Q. And is there a team that evaluates those 11:20

21 approvals? 11:20

22 A. Yes. 11:20

23 Q. And what about partners? Do they just -- is 11:20

24 that just the only system that exists for them, too, 11:20

25 or is there something else? 11:20

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1 MR. FALCONER: Objection. Form. 11:20

2 THE WITNESS: I'm not sure I understand. 11:21

3 BY MR. LOESER: 11:21

4 Q. Do partners just go through the developer 11:21

5 platform you just described, or is there another way 11:21

6 for them to negotiate API permissions? 11:21

7 A. So -- 11:21

8 MR. FALCONER: Objection. Form. 11:21

9 THE WITNESS: So they go through that 11:21

10 process. 11:21

11 BY MR. LOESER: 11:21

12 Q. So there's -- so there's no difference 11:21

13 between how partners access and make use of APIs and 11:21

14 the public, the public -- 11:21

15 A. Sorry I -- 11:21

16 MR. FALCONER: Objection. Form. 11:21

17 BY MR. LOESER: 11:21

18 Q. I'm just trying to understand. We will get 11:21

19 into some documents that maybe will flush this out. 11:21

20 But in terms of the different ways that APIs 11:21

21 are accessed, you have described a way that 11:21

22 developers just go on a platform. And I'm asking 11:21

23 you: Is there a different way for partners that 11:21

24 interact with Facebook? 11:21

25 MR. FALCONER: Objection. Form. 11:21

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1 THE WITNESS: So I -- like I think it's a 11:21  
2 little broad. So I -- I'm struggling to know 11:21  
3 exactly. But, yes, they -- depending on specific 11:21  
4 need, they could go through a partnership 11:22  
5 organization. 11:22  
6 BY MR. LOESER: 11:22  
7 Q. And were you involved at all in working with 11:22  
8 partners and specifically with regard to the APIs 11:22  
9 that they sought permission to utilize? 11:22  
10 MR. FALCONER: Objection. Form. 11:22  
11 THE WITNESS: Sorry. I don't understand, 11:22  
12 like going through the developer platform or... 11:22  
13 BY MR. LOESER: 11:22  
14 Q. No. Just in your role working with 11:22  
15 partners, have you ever had occasion to discuss with 11:22  
16 partners the permissions that they wanted for APIs? 11:22  
17 A. Yes. 11:22  
18 Q. Okay. And explain that process. 11:22  
19 A. So I don't remember in detail because it's 11:22  
20 been a long time. But they could email us about it, 11:22  
21 and we would generally refer them to where they 11:22  
22 needed to go. 11:22  
23 Q. And do you know when Facebook first started 11:23  
24 using APIs with its partners? 11:23  
25 A. Sorry. Can you say that -- state that 11:23

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1 again? 11:23

2 Q. Do you know when Facebook first started 11:23

3 using APIs with its partners? 11:23

4 A. I'm not sure I understand that question. 11:23

5 Technically, I don't know. 11:23

6 Q. Do you know who came up with the various 11:23

7 APIs that Facebook has? 11:23

8 A. No. 11:23

9 Q. Are you familiar with the concept of Friend 11:23

10 Sharing on the Facebook platform? 11:23

11 A. I think I've heard of it, but I don't know 11:23

12 what it is. 11:23

13 Q. Are you aware that on the Facebook platform 11:23

14 for a period of time, when a friend downloaded an 11:24

15 app, that app could obtain access to that person's 11:24

16 friends via Friend Sharing APIs? 11:24

17 MR. FALCONER: Objection. Form. 11:24

18 Go ahead. 11:24

19 THE WITNESS: I don't remember. 11:24

20 BY MR. LOESER: 11:24

21 Q. You don't remember anything about that? 11:24

22 A. No. 11:24

23 Q. That's not something you were involved at 11:24

24 all in? 11:24

25 A. I don't remember. 11:24

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1 Q. That wasn't a significant part of the work 11:24  
2 that you did for Facebook? 11:24

3 A. I don't understand. Sorry, I -- I worked on 11:24  
4 a lot of things, so I don't know the meaning of 11:24  
5 that. 11:24

6 Q. But the work that you did with regard to 11:24  
7 Friend Sharing in particular does not stand out for 11:24  
8 you as being particularly meaningful? 11:24

9 MR. FALCONER: Objection --

10 THE WITNESS: I don't think I worked on 11:24  
11 Friend Sharing. 11:24

12 BY MR. LOESER:

13 Q. Do you know what sort of information is 11:24  
14 generally made available through friends 11:25  
15 permissions? 11:25

16 A. No, I don't. 11:25

17 Q. Are you aware of whether an app can obtain 11:25  
18 information about a person's friends who did not 11:25  
19 download the app? 11:25

20 MR. FALCONER: Objection. Form. 11:25

21 THE WITNESS: I don't know. 11:25

22 BY MR. LOESER: 11:25

23 Q. Do you know how many different friends 11:25  
24 permissions APIs there are? 11:25

25 A. I don't know. 11:25

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1 Q. Are you familiar with the term "high-signal 11:25  
2 APIs"? 11:25

3 A. No. 11:25

4 Q. Are you familiar with the read\_stream 11:25  
5 permissions APIs? 11:25

6 A. I've heard of it. 11:25

7 Q. Okay. What do you know about that? 11:25

8 A. I can't recall. It's been so long, I don't 11:25  
9 know. 11:26

10 Q. Do you know who came up with the idea of 11:26  
11 friends permissions APIs? 11:26

12 A. No, I don't. 11:26

13 Q. Do you know what purpose it served? 11:26

14 A. No. 11:26

15 Q. Do you know if it was controversial? 11:26

16 A. I don't know. 11:26

17 Q. Do you know if that was a API -- the friends 11:26  
18 APIs were often misused or abused by app developers? 11:26

19 A. I don't know. 11:26

20 MR. LOESER: I will show you Exhibit -- what 11:26  
21 we marked as Exhibit 4. 11:26

22 (Exhibit 4 marked for identification.) 11:26

23 BY MR. LOESER: 11:26

24 Q. We will share that as well. 11:26

25 Exhibit 4 is an email from Marie Hagman to 11:26

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1 Chris Daniels, with a cc to you, dated May 3rd, 11:27  
2 2013, "Subject: Re: FQL question." 11:27  
3 Do you see that, Miss Chang? 11:27  
4 A. Yes. May I read it? 11:27  
5 Q. Yes, of course. I'm going to ask you some 11:27  
6 specific questions about different parts of the 11:27  
7 email string, but -- so we will go through it, but 11:27  
8 if you want to take a look at it, go ahead. 11:27  
9 A. Okay. 11:27  
10 Q. Miss Chang, what is "FQL"? 11:27  
11 A. I believe it's something like SQL, but I 11:27  
12 don't know enough of the technical -- I don't know 11:27  
13 what the term means. 11:28  
14 Q. Okay. And if this email was cc'd to you, 11:28  
15 does that mean that you received the email? 11:28  
16 A. Yes. 11:28  
17 Q. As we go through a lot of these emails, if 11:28  
18 you are on the email as a recipient, you don't have 11:28  
19 any reason to believe you didn't receive the emails; 11:28  
20 right? 11:28  
21 A. Sorry. I didn't what? 11:28  
22 Q. If you're on an email as a recipient -- we 11:28  
23 are going to go through a number of emails -- there 11:28  
24 is no reason for you to believe that you did not 11:28  
25 actually receive the email; correct? 11:28

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1 A. I don't think so. 11:28

2 Q. Okay. And this particular email string has 11:28

3 to do with [REDACTED] 11:28

4 [REDACTED]; is that right? 11:28

5 A. Yes. 11:28

6 Q. Do you understand what [REDACTED]? 11:28

7 A. Not in technical detail. 11:28

8 Q. What's your general understanding of what [REDACTED] 11:28

9 [REDACTED] 11:28

10 [REDACTED]? 11:28

11 A. [REDACTED]. 11:28

12 Q. Okay. When you say [REDACTED] that 11:29

13 means [REDACTED]; is that 11:29

14 right? 11:29

15 A. Again, I don't know the technical specifics. 11:29

16 Q. Can you use [REDACTED] 11:29

17 [REDACTED]? 11:29

18 A. I don't know. 11:29

19 Q. You don't have any understanding of what 11:29

20 [REDACTED]? 11:29

21 A. I don't think I understand in -- how the 11:29

22 context you're referring it to. 11:29

23 Q. Okay. Nonetheless, this email string 11:29

24 discusses [REDACTED]; is 11:29

25 that right? 11:29

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1 A. It looks like it. 11:29

2 Q. Okay. So if you look down the first page 11:29

3 there, in an email from Marie Hagman to you, it 11:29

4 says: 11:29

5 "Thanks Jackie, will do. 11:29

6 "If it's helpful, here is [REDACTED] 11:29

7 [REDACTED] 11:30

8 [REDACTED] 11:30

9 [REDACTED]. " 11:30

10 Do you see that list? 11:30

11 A. Yes. 11:30

12 Q. And do those appear to be [REDACTED] 11:30

13 [REDACTED]? 11:30

14 A. I don't know enough where I would classify 11:30

15 them that. I don't know the technical specifics to 11:30

16 make that assertion. 11:30

17 Q. Okay. So when you look at [REDACTED] 11:30

18 [REDACTED] and, for example, [REDACTED] 11:30

19 [REDACTED] you don't 11:30

20 have any understanding of whether [REDACTED]? 11:30

21 A. Yeah, I don't -- I don't know. 11:30

22 Q. Go down [REDACTED] and you will see [REDACTED] -- 11:30

23 you will see [REDACTED] 11:30

24 [REDACTED] 11:30

25 Do you know [REDACTED] 11:30

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1 [REDACTED]? 11:30

2 A. No, I don't. 11:30

3 Q. Was [REDACTED] a client that -- or a partner 11:30

4 that you were working -- you had any involvement 11:31

5 with? 11:31

6 A. Yes, I supported them. 11:31

7 Q. And what does that mean? 11:31

8 A. I supported them with their questions and 11:31

9 inquiries at the time as a partner manager. 11:31

10 Q. And what kinds of questions and inquiries 11:31

11 did they -- did they have? 11:31

12 A. It could be from [REDACTED] 11:31

13 [REDACTED]. 11:31

14 Q. Okay. Was it also [REDACTED] 11:31

15 [REDACTED] 11:31

16 [REDACTED]? 11:31

17 A. Yes. Like I said, [REDACTED] 11:31

18 [REDACTED]. 11:31

19 Q. And by "[REDACTED]," do you mean [REDACTED] 11:31

20 [REDACTED]? 11:31

21 A. That's part of it. But [REDACTED] 11:31

22 typically means like [REDACTED]. 11:31

23 Q. And in order to support that partner, you 11:31

24 needed to be knowledgeable about what they were 11:31

25 asking for; right? 11:31

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1 A. Not necessarily. We worked with partner 11:31  
2 engineering, who did more of the technical list. 11:31

3 Q. But as a general matter, if they came to you 11:32  
4 and they said, "[REDACTED]" 11:32  
5 "[REDACTED]," you did something to understand what 11:32  
6 those were. 11:32

7 A. Not necessarily. So, again, I'm not the 11:32  
8 technical experts, which is why there's product 11:32  
9 managers involved and also partner engineering 11:32  
10 involved. 11:32

11 Q. I understand you're not the technical 11:32  
12 expert, but do you have a general understanding of 11:32  
13 how this operated? 11:32

14 A. I don't understand what your definition of 11:32  
15 general, like, understanding is. 11:32

16 Q. Well, here is an email string that's about 11:32  
17 [REDACTED]. Do you have a general understanding 11:32  
18 of what "[REDACTED]" are? 11:32

19 A. No, I don't. 11:32

20 Q. And do you have a general understanding of 11:32  
21 what "[REDACTED]" means? 11:32

22 A. I don't recall. 11:32

23 Q. So they were asking for these things and you 11:32  
24 were communicating what they were asking for, but 11:32  
25 you didn't have any idea what it meant? 11:32

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1 A. At that time, I -- I imagine I -- I was 11:32  
2 helping to support it, but I don't remember it now. 11:33

3 Q. Looking, again, at the -- [REDACTED] 11:33  
4 [REDACTED] is 11:33  
5 it your testimony that you have no understanding 11:33  
6 whatsoever of [REDACTED] 11:33  
7 [REDACTED] 11:33  
8 [REDACTED]? 11:33

9 A. So I don't know what technically came 11:33  
10 through. I can see what it says, but I don't know 11:33  
11 what technically is shared. 11:33

12 Q. And who would know the answer to that at 11:33  
13 Facebook? 11:33

14 A. A product manager or a partner engineer. 11:33  
15 Well, I don't know if it's a partner engineer, but 11:33  
16 engineering and product managers. 11:33

17 Q. And are they [REDACTED] 11:33  
18 [REDACTED] 11:33  
19 [REDACTED]? 11:33

20 A. [REDACTED] 11:33

21 Q. And so if in the context of this email, in 11:33  
22 which you apparently don't understand any of the 11:34  
23 technical aspects, if someone emailed you and said, 11:34  
24 "Jackie, what does [REDACTED] 11:34  
25 [REDACTED] mean?" who specifically would you ask to 11:34

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1 answer that question? 11:34

2 A. I don't remember. I don't know off the top 11:34

3 of my head. 11:34

4 Q. If you can flip back in the string to 11:34

5 page 3. You will see an email from [REDACTED] 11:34

6 [REDACTED] to Jessica Jenks at Facebook, dated May 3rd, 11:34

7 2013. Do you see that in the string? 11:35

8 A. Yes. 11:35

9 Q. So if you read that email, it says: 11:35

10 "Hi Marie, 11:35

11 "[REDACTED] 11:35

12 [REDACTED] 11:35

13 [REDACTED] 11:35

14 [REDACTED]. We found an issue 11:35

15 though: [REDACTED] 11:35

16 [REDACTED] ([REDACTED] 11:35

17 [REDACTED] 11:35

18 [REDACTED] 11:35

19 [REDACTED].) 11:35

20 "Can you please tell us how [REDACTED] 11:35

21 [REDACTED] 11:35

22 [REDACTED] 11:35

23 [REDACTED]?" 11:35

24 Do you see that? 11:35

25 A. Yes. 11:35

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1 Q. What is the "[REDACTED]"? 11:35

2 A. Developer.Facebook.com. 11:35

3 Q. Okay. So those are [REDACTED] 11:35

4 [REDACTED]; right? 11:35

5 A. [REDACTED]. It doesn't mean that 11:35

6 [REDACTED]. 11:35

7 Q. Now, this [REDACTED] 11:35

8 [REDACTED] 11:36

9 [REDACTED]; is that right? 11:36

10 A. From what the email says. I don't know 11:36

11 specifically -- 11:36

12 Q. So how would -- 11:36

13 A. -- if there was a way.

14 Q. How would [REDACTED] 11:36

15 [REDACTED]? 11:36

16 A. I don't know. I don't understand what 11:36

17 the -- what do you mean by that? 11:36

18 Q. Well, I guess, look at the email -- 11:36

19 A. Uh-huh. 11:36

20 Q. -- this is [REDACTED] 11:36

21 [REDACTED], [REDACTED] 11:36

22 [REDACTED]; right? That's what they're saying. 11:36

23 A. Yes, I see that. 11:36

24 Q. And the way they [REDACTED] 11:36

25 [REDACTED] 11:36

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1 [REDACTED] ." 11:36

2 What does that mean? 11:36

3 A. So I don't know. I wasn't in that 11:36

4 interaction. 11:37

5 Q. So you don't know what "[REDACTED]" is? 11:37

6 A. As a concept or... 11:37

7 Q. As expressed in this email, do you know what 11:37

8 "[REDACTED]" is? 11:37

9 A. I know of it as a concept, but not specific 11:37

10 to that scenario because I wasn't there. 11:37

11 Q. So as a concept, how would [REDACTED] 11:37

12 [REDACTED] 11:37

13 [REDACTED]? 11:37

14 A. Well, so I can't make any assertions about 11:37

15 this scenario, but at a high level, around the 11:37

16 concepts of [REDACTED]. 11:37

17 Q. Explain that. 11:37

18 A. In -- I don't know the technical details, so 11:37

19 that's as much as I know. 11:37

20 Q. So what you can tell from this email is that 11:37

21 [REDACTED] 11:37

22 [REDACTED]; is that 11:37

23 right? 11:37

24 MR. FALCONER: Objection. Foundation. 11:37

25 THE WITNESS: Sorry. Can you say that 11:37

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1 again? 11:38

2 BY MR. LOESER: 11:38

3 Q. Can you tell from this email that [REDACTED] 11:38

4 [REDACTED] 11:38

5 [REDACTED]? 11:38

6 A. So, again, I was not there, so I don't -- I 11:38

7 don't know beyond what the email says. 11:38

8 Q. Well, let's move up the string, and if you 11:38

9 look at the email from you, Jackie Chang, to 11:38

10 Marie -- 11:38

11 A. Uh-huh. 11:38

12 Q. -- dated May 3rd, subject same, "FQL 11:38

13 question." So you were personally involved in this 11:38

14 email string; right? 11:38

15 A. It looks that way, yes. 11:38

16 Q. Okay. And why don't you read what you wrote 11:38

17 that starts with No. 1. Let me start it for you, it 11:38

18 says, at the top of your email: 11:38

19 "Chris Daniel to help set expectation 11:38

20 at the highest level & Bryan who's 11:39

21 also now working with [REDACTED]." 11:39

22 And then why don't you read what comes under 11:39

23 that? 11:39

24 A. "1/We should not be [REDACTED] 11:39

25 [REDACTED] 11:39

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1 [REDACTED] 11:39  
2 [REDACTED] 11:39  
3 [REDACTED]. @Chris 11:39  
4 & Bryan, we should be emphasizing 11:39  
5 this understanding as it seems like 11:39  
6 they're under the impression that 11:39  
7 we're going to work with them on 11:39  
8 this front. 11:39  
9 "2/If they're asking for [REDACTED] 11:39  
10 [REDACTED] 11:39  
11 [REDACTED]. Even if 11:39  
12 [REDACTED] 11:39  
13 [REDACTED] 11:39  
14 [REDACTED]. 11:39  
15 Q. You can stop there. 11:39  
16 Does that refresh your recollection at all 11:39  
17 as to what the conversation below that concerned 11:39  
18 with these [REDACTED]? 11:39  
19 A. I don't remember. 11:39  
20 Q. Okay. And what is it that you're saying [REDACTED] 11:39  
21 [REDACTED] 11:39  
22 [REDACTED]? 11:40  
23 A. It says: 11:40  
24 "We should not be [REDACTED] 11:40  
25 [REDACTED] 11:40

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1 [REDACTED] 11:40  
2 [REDACTED] 11:40  
3 [REDACTED] 11:40  
4 Q. Okay. So what are you saying there? What 11:40  
5 does that mean? 11:40  
6 A. I don't remember at this point. 11:40  
7 Q. So you can see the words, and are you -- 11:40  
8 A. Yes. 11:40  
9 Q. -- saying [REDACTED] that, we're [REDACTED] 11:40  
10 [REDACTED] 11:40  
11 [REDACTED]? 11:40  
12 MR. FALCONER: Objection. 11:40  
13 BY MR. LOESER: 11:40  
14 Q. Earlier we talked a bit about [REDACTED]. 11:40  
15 Would this be an example of [REDACTED], that [REDACTED] 11:40  
16 [REDACTED] 11:40  
17 [REDACTED]? 11:40  
18 MR. FALCONER: Objection. Form. 11:40  
19 THE WITNESS: So I don't remember this since 11:40  
20 this was in 2013, so I can't make that assertion. 11:40  
21 BY MR. LOESER: 11:41  
22 Q. Well, I understand it was in 2013, but you 11:41  
23 just read the email that you wrote, and you 11:41  
24 understand what you wrote; right? 11:41  
25 A. Not from 2013. 11:41

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1 Q. So is it fair to say that [REDACTED] 11:41  
2 [REDACTED]? 11:41  
3 Is that clear from this email? 11:41  
4 A. Well, it says that [REDACTED] 11:41  
5 [REDACTED]. 11:41  
6 Q. Okay. And, then, if [REDACTED] 11:41  
7 [REDACTED], does that mean, as you 11:41  
8 look at this, that [REDACTED] 11:41  
9 [REDACTED] 11:41  
10 [REDACTED]? 11:41  
11 A. I don't know. 11:41  
12 Q. So, Miss Chang, are you telling the jury 11:41  
13 that as you read the email that you wrote, you have 11:41  
14 no understanding of what you meant? 11:41  
15 MR. FALCONER: Objection. Form. 11:41  
16 THE WITNESS: So I don't know now, given 11:41  
17 that that was in 2013. I don't remember enough to 11:41  
18 make that assertion. 11:42  
19 BY MR. LOESER: 11:42  
20 Q. So does the phrase "[REDACTED]" 11:42  
21 mean something different now than it meant in 2013? 11:42  
22 A. I'm not sure I understand. 11:42  
23 Q. Well, the way your sentence is structured, 11:42  
24 it starts with [REDACTED] and 11:42  
25 ends with [REDACTED]; is 11:42

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1 that right? 11:42

2 A. So it says [REDACTED] 11:42

3 [REDACTED] 11:42

4 [REDACTED] -- 11:42

5 [REDACTED]. 11:42

6 Q. Okay. So you didn't say, [REDACTED] 11:42

7 [REDACTED]; right? 11:42

8 A. It says [REDACTED] 11:42

9 Q. It doesn't say [REDACTED]. It says 11:42

10 [REDACTED]; right? So if [REDACTED] 11:42

11 [REDACTED], then the way you -- the 11:42

12 information you wrote and expressed to all the 11:42

13 people that are on this email, you were [REDACTED] 11:42

14 [REDACTED] 11:43

15 [REDACTED]; right? 11:43

16 And isn't that just [REDACTED] 11:43

17 [REDACTED] 11:43

18 [REDACTED]? It was [REDACTED] 11:43

19 [REDACTED]; right? 11:43

20 MR. FALCONER: Objection. Form. 11:43

21 THE WITNESS: No. I can't make that 11:43

22 assertion broadly about all partnerships. 11:43

23 BY MR. LOESER: 11:43

24 Q. Okay. What about [REDACTED], 11:43

25 Miss Chang? The [REDACTED]. Isn't that 11:43

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1       what this email clearly indicates? 11:43

2               MR. FALCONER: Objection. Form and asked 11:43

3       and answered. 11:43

4               THE WITNESS: So, again, I -- I see what it 11:43

5       says, but I don't recall from that time, so I can't 11:43

6       make that assertion. 11:43

7               MR. LOESER: Okay. We can go to the next 11:43

8       exhibit, which should be tab 5. 11:44

9               Actually, if we can go off the record for 11:44

10       one second. Give us three minutes. 11:44

11               THE VIDEOGRAPHER: Okay. Going off the 11:44

12       record. The time is 11:44. 11:44

13               (Off the record.) 11:44

14               THE VIDEOGRAPHER: We are back on the 11:48

15       record. The time is 11:48. 11:48

16               (Exhibit 5 marked for identification.) 11:48

17       BY MR. LOESER: 11:48

18               Q. Miss Chang, we are showing you what's now 11:48

19       been marked Exhibit 5, which we will screen share as 11:48

20       well, which is an email from Constantin, and I'm 11:48

21       sure I will get this last name wrong, but 11:49

22       Koumouzelis. Is that how you say that? 11:49

23               A. Sorry. I'm also trying to update the 11:49

24       Egnyte. I can't even say his last name. I call him 11:49

25       "KP." 11:49

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1 Q. Okay. So an email from KP to Visha Gupta -- 11:49

2 A. Oh, sorry. Wrong person. Not the same 11:49

3 person. 11:49

4 Q. How do you say this person's last name? 11:49

5 A. I don't know how to say his last name. 11:49

6 Q. Call him "CK." How about that? 11:49

7 A. Okay. 11:49

8 Q. And it is an email sent Friday, August 16th, 11:49

9 and it goes to a number of people. 11:49

10 Visha Gupta, do you know who that is? 11:49

11 A. I think I know. I think I could see his 11:49

12 face, but I don't know well. 11:49

13 Q. Okay. And it also went to Douglas Purdy. 11:49

14 Do you know who that is; right? 11:49

15 A. Yes. 11:49

16 Q. And his job was what? 11:49

17 A. Director of Platform Product, I think. 11:49

18 Q. And there are several other people that 11:50

19 received this email, and you're familiar with who 11:50

20 these people are; right? 11:50

21 A. Yes, I know who they are. 11:50

22 Q. And these are people that you worked with 11:50

23 regularly at the time? 11:50

24 A. Not necessarily regularly. I probably know 11:50

25 them more via emails. 11:50

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1 Q. Who is Eddie O'Neil? 11:50

2 A. I believe in 2013, he was a product manager. 11:50

3 Q. And do you see the subject line says "Re: 11:50

4 [REDACTED]"? 11:50

5 A. Yes, I see that. 11:50

6 Q. An attachment "[REDACTED]." Do you 11:50

7 see that? 11:50

8 A. Yes. 11:50

9 Q. Now, you're not a recipient of this email, 11:50

10 but do you recall [REDACTED], what that was all 11:50

11 about? 11:50

12 A. Not specifically. 11:50

13 MR. LOESER: Okay. Well, why don't we look 11:50

14 at the attachment. Maybe that will refresh your 11:51

15 recollection. 11:51

16 We will mark Exhibit 6. 11:51

17 (Exhibit 6 marked for identification.) 11:51

18 THE WITNESS: Sorry. Am I supposed to open 11:51

19 it? 11:51

20 BY MR. LOESER:

21 Q. Yes. We can go to Exhibit 6. 11:51

22 A. I don't see anything. 11:51

23 Q. It takes a minute. It's traveling through 11:51

24 space. 11:51

25 A. Oh, okay. 11:51

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1 Q. If you can take a minute to familiarize 11:51  
2 yourself with the document. 11:51

3 A. Yes, may I have a minute? Thank you. 11:51

4 Q. So I will have a couple of questions about a 11:53  
5 few paragraphs of this. So when you have had enough 11:53  
6 time to familiarize yourself with the document -- 11:53

7 A. Do I need to read the whole thing or... 11:53

8 Q. No. 11:53

9 A. Okay. Okay. 11:53

10 Q. In looking at this document and reading what 11:53  
11 you have read, do you recall what [REDACTED] was? 11:53

12 A. Not specifically. 11:53

13 Q. Do you recall being involved in discussions 11:53  
14 about [REDACTED]? 11:53

15 A. Not specifically. 11:53

16 Q. Do you recall in general? 11:54

17 A. I don't just because it's been a really long 11:54  
18 time so I don't know -- 11:54

19 Q. Well, let's look at the -- 11:54

20 A. -- [REDACTED]. Sorry. 11:54

21 Q. Okay. Was it referred to in ways other than 11:54  
22 "[REDACTED]"? 11:54

23 A. I don't know. 11:54

24 Q. Do you recall the transition from Graph API 11:54  
25 version 1 to Graph API version 2? 11:54

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1 A. I recall a transition, but I [REDACTED] 11:54  
2 [REDACTED]. 11:54  
3 Q. You don't recall if [REDACTED] 11:54  
4 [REDACTED]? 11:54  
5 A. I don't just because [REDACTED] 11:54  
6 [REDACTED], so I don't -- I don't remember 11:54  
7 all the specific changes. 11:54  
8 Q. Well, let's look at the beginning of this 11:54  
9 document on "Overview." It says: 11:54  
10 " [REDACTED] 11:54  
11 [REDACTED] [REDACTED] 11:54  
12 [REDACTED] 11:54  
13 [REDACTED] 11:54  
14 [REDACTED] 11:54  
15 [REDACTED] [REDACTED] 11:55  
16 [REDACTED] [REDACTED] 11:55  
17 [REDACTED] [REDACTED] 11:55  
18 [REDACTED] 11:55  
19 Did you receive [REDACTED]? 11:55  
20 A. Not directly. 11:55  
21 Q. Okay. How about indirectly? 11:55  
22 A. What do you mean by that? 11:55  
23 Q. Were you aware of [REDACTED]? 11:55  
24 A. I -- I'm not -- well, I guess, I don't like 11:55  
25 recall anything specific. But I've heard it 11:55

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1 mentioned, but I don't know anything specific about 11:55  
2 [REDACTED]. 11:55  
3 Q. Okay. Well, let's read on. 11:55  
4 [REDACTED] [REDACTED] 11:55  
5 [REDACTED] 11:55  
6 [REDACTED] 11:55  
7 [REDACTED] 11:55  
8 [REDACTED] 11:55  
9 [REDACTED] 11:55  
10 [REDACTED] 11:55  
11 Do you see that? 11:55  
12 A. Yes. 11:55  
13 Q. Then down below, the next paragraph says: 11:55  
14 [REDACTED] 11:55  
15 [REDACTED] 11:55  
16 [REDACTED] 11:56  
17 [REDACTED]. " 11:56  
18 Do you see that? 11:56  
19 A. Yes. 11:56  
20 Q. It says: 11:56  
21 [REDACTED] 11:56  
22 [REDACTED] 11:56  
23 [REDACTED] 11:56  
24 [REDACTED] [REDACTED] 11:56  
25 [REDACTED] 11:56

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1 [REDACTED] 11:56  
2 [REDACTED] -- 11:56  
3 DEPOSITION REPORTER: "[REDACTED]" 11:56  
4 [REDACTED] "... " Go 11:56  
5 ahead, please.  
6 BY MR. LOESER.  
7 Q. "... [REDACTED]  
8 [REDACTED] 11:56  
9 [REDACTED] 11:56  
10 [REDACTED] 11:56  
11 [REDACTED] 11:56  
12 [REDACTED] ." 11:56  
13 Do you see that? 11:56  
14 A. Yes. 11:56  
15 Q. Now, Miss Chang, do you recall being 11:56  
16 involved in the -- [REDACTED] 11:56  
17 [REDACTED]? 11:56  
18 A. I don't. 11:56  
19 Q. Why don't we go down this document to 11:56  
20 page 2, under the heading "[REDACTED]." 11:56  
21 Do you remember your involvement and the 11:56  
22 conversation about [REDACTED]? 11:56  
23 A. I remember [REDACTED] as a concept, 11:56  
24 but I don't remember specific conversations. 11:57  
25 Q. Okay. What was "[REDACTED]" as a 11:57

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1 concept? 11:57

2 A. [REDACTED] is [REDACTED] he 11:57

3 [REDACTED] 11:57

4 [REDACTED]. 11:57

5 Q. Do you see below "[REDACTED]" it says, 11:57

6 "[REDACTED]." Is that right? 11:57

7 A. Sorry, where is that one? 11:57

8 Q. It's on screen share, as well, if that's 11:57

9 easier. 11:57

10 A. Okay. Oh, sorry. Yes. 11:57

11 Q. Okay. And if you read what it says, it 11:57

12 says: 11:57

13 "We are [REDACTED] 11:57

14 [REDACTED] 11:57

15 [REDACTED] 11:57

16 [REDACTED]. Our philosophy is [REDACTED] 11:57

17 [REDACTED] 11:58

18 [REDACTED] 11:58

19 [REDACTED]. [REDACTED] 11:58

20 [REDACTED] 11:58

21 [REDACTED] 11:58

22 [REDACTED] 11:58

23 [REDACTED]. " 11:58

24 Do you see that? 11:58

25 A. Yes. 11:58

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1 Q. "[REDACTED], 11:58  
2 [REDACTED] 11:58  
3 [REDACTED] 11:58  
4 [REDACTED] 11:58  
5 [REDACTED]. [REDACTED] 11:58  
6 [REDACTED] 11:58  
7 [REDACTED] 11:58  
8 [REDACTED] 11:58  
9 [REDACTED]. " 11:58  
10 Do you see that? 11:58  
11 A. Yes. 11:58  
12 Q. Do you recall conversations around 11:58  
13 [REDACTED]? 11:58  
14 A. I don't. 11:58  
15 Q. You have no memory of that? 11:58  
16 A. Not specifically. 11:58  
17 Q. Do you know what [REDACTED] " means? 11:58  
18 A. Yes. To -- to [REDACTED]. 11:58  
19 Q. And so what [REDACTED] 11:58  
20 [REDACTED] 11:59  
21 [REDACTED] 11:59  
22 [REDACTED]; is that right? 11:59  
23 A. Whatever was stated there. 11:59  
24 Q. And so if [REDACTED] 11:59  
25 [REDACTED] 11:59

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1 [REDACTED] 11:59

2 [REDACTED]. Is that your -- is that your 11:59

3 understanding? 11:59

4 A. I don't know specifically to make that 11:59

5 assertion beyond what I'm reading. 11:59

6 Q. You have no independent memory of [REDACTED] 11:59

7 [REDACTED]? 11:59

8 A. No. 11:59

9 Q. That wasn't a significant event in your 11:59

10 mind? 11:59

11 A. No. 11:59

12 Q. Why don't we go down the document to the 11:59

13 heading that says, "[REDACTED] 11:59

14 [REDACTED]. " 11:59

15 Do you see that? 12:00

16 A. Yes. 12:00

17 Q. And this says: 12:00

18 "We will be [REDACTED] 12:00

19 [REDACTED] 12:00

20 [REDACTED]. This is an 12:00

21 [REDACTED] 12:00

22 [REDACTED]. 12:00

23 [REDACTED] 12:00

24 [REDACTED] 12:00

25 [REDACTED] 12:00

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1 [REDACTED]. There is [REDACTED] 12:00

2 [REDACTED] 12:00

3 [REDACTED] 12:00

4 [REDACTED] 12:00

5 [REDACTED]. " 12:00

6 Do you remember a conversation regarding [REDACTED] 12:00

7 [REDACTED]? 12:00

8 A. I don't believe I was in any specific 12:00

9 conversations around it. 12:00

10 Q. You don't recall any involvement you had in 12:00

11 [REDACTED] 12:00

12 [REDACTED]? 12:00

13 A. I don't recall specifically. 12:00

14 Q. And you don't recall any conversations with 12:00

15 [REDACTED] 12:00

16 [REDACTED]? 12:00

17 A. I don't recall specifically. 12:01

18 Q. Do you have any recollection of [REDACTED] 12:01

19 [REDACTED] 12:01

20 [REDACTED] 12:01

21 [REDACTED]? 12:01

22 A. I don't specifically remember. 12:01

23 Q. Do you generally remember? 12:01

24 A. I remember a general ask, but I don't 12:01

25 remember the details of it. 12:01

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1 Q. Was [REDACTED] something 12:01  
2 that you ever discussed with your colleagues? 12:01  
3 A. I don't remember. 12:01  
4 Q. Do you recall [REDACTED] 12:01  
5 [REDACTED]? 12:01  
6 A. I don't remember. 12:01  
7 Q. You have no recollection of that whatsoever? 12:02  
8 A. No. 12:02  
9 Q. Do you remember what your job was in 2013? 12:02  
10 A. I believe it was a partner manager. 12:02  
11 MR. LOESER: I will move to Exhibit 7. 12:02  
12 (Exhibit 7 marked for identification.) 12:02  
13 BY MR. LOESER: 12:02  
14 Q. It will show up shortly and we will screen 12:02  
15 share the exhibit as well. It's thinking. You will 12:02  
16 get it. We're waiting for the document to load. 12:02  
17 Okay. Do you have it? Can you see the 12:03  
18 document? There we go. 12:04  
19 All right. I'm showing you Exhibit 7, which 12:04  
20 is an email from KP. We can agree to call this 12:04  
21 person "KP"; right? 12:04  
22 A. Yes. 12:04  
23 Q. You know who I'm talking to when I say "KP"? 12:04  
24 A. Yes. 12:04  
25 Q. Okay. And it's an email to Ime Archibong 12:04

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1 and yourself; is that right? 12:04

2 A. Yes. 12:04

3 Q. And it's dated August 21st, 2013. The 12:04

4 subject "Re: [REDACTED] 12:04

5 [REDACTED]." Is that right? 12:04

6 A. Yes. 12:04

7 Q. There is an attachment that says, "[REDACTED] 12:04

8 [REDACTED]." 12:04

9 Do you see that? 12:04

10 A. Yes. 12:04

11 Q. Can you tell me what "[REDACTED] 12:04

12 [REDACTED]" relates to? 12:04

13 A. "[REDACTED]" means [REDACTED], like [REDACTED], 12:04

14 [REDACTED] I don't know what "[REDACTED]" is referring 12:05

15 to. 12:05

16 Q. Do you think that might refer to [REDACTED] 12:05

17 that we just went through? 12:05

18 A. I -- I don't recall specifically. 12:05

19 Q. Okay. Do you want to take -- 12:05

20 MR. FALCONER: My apologies. My mic was 12:05

21 muted. I had a form objection to that last 12:05

22 question. Sorry. I was late on that. 12:05

23 BY MR. LOESER: 12:05

24 Q. I'm going to ask you some questions about 12:05

25 this email string, and I can just jump right in or 12:05

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1 if you want to flip through the document first, 12:05  
2 that's fine too. 12:05  
3 A. Yes. If I can have one minute to look, that 12:05  
4 would be great. Thank you. 12:05  
5 Yes, okay. 12:06  
6 Q. Okay. Why don't we go to the beginning of 12:06  
7 the email string, so if you flip through to the end 12:06  
8 of this document, on the second-to-the-last page, 12:06  
9 there's an email from Ime Archibong to you, dated 12:06  
10 August 21st, 2013. Do you see that? 12:06  
11 A. Yes. 12:06  
12 Q. And it has the same subject line we read 12:06  
13 before? 12:06  
14 A. Yes. 12:06  
15 Q. And that email forwards a string -- forwards 12:06  
16 an email that you sent down in the paragraph below 12:07  
17 it. Do you see that? You sent it at 2:30 a.m. 12:07  
18 A. Yes. 12:07  
19 Q. Okay. Let's look at that email. Why don't 12:07  
20 you read the first paragraph of what you wrote to 12:07  
21 Ime and Chris. 12:07  
22 A. "Working with KP to further synthesize 12:07  
23 [REDACTED] 12:07  
24 [REDACTED] 12:07  
25 [REDACTED]" 12:07

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1 [REDACTED] . 12:07

2 KP is working on the [REDACTED] 12:07

3 [REDACTED], but 12:07

4 we're also working in parallel to 12:07

5 [REDACTED] 12:07

6 [REDACTED] . " 12:07

7 Q. And so does this refresh your recollection 12:07

8 about your involvement in [REDACTED]? 12:07

9 A. Not too much because this was the period I 12:07

10 was moving off of this and working on Internet.org, 12:08

11 so I don't recall a lot of the specifics at this 12:08

12 time since I was handing it off. 12:08

13 Q. Okay. But looking at this email, it's fair 12:08

14 to say that this discussion is in the context of [REDACTED] 12:08

15 [REDACTED] 12:08

16 [REDACTED] 12:08

17 [REDACTED]; is that right? 12:08

18 A. So I don't remember. 12:08

19 Q. You just went through [REDACTED] document we 12:08

20 looked at before, which described [REDACTED] 12:08

21 [REDACTED]; right? 12:08

22 A. Correct. 12:08

23 Q. And do you have any reason to now think that 12:08

24 [REDACTED] 12:08

25 [REDACTED]? 12:08

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1 A. So I -- 12:08

2 MR. FALCONER: Objection to form. 12:08

3 THE WITNESS: So I don't remember enough to 12:08

4 make that connection. 12:08

5 BY MR. LOESER: 12:08

6 Q. So looking at your email, it looks like you 12:08

7 came up with [REDACTED] 12:08

8 [REDACTED] 12:09

9 [REDACTED]; is that right? 12:09

10 DEPOSITION REPORTER: Excuse me. There was 12:09

11 an interruption in the audio. Can you repeat your 12:09

12 question, please, Counsel. 12:09

13 BY MR. LOESER: 12:09

14 Q. Yeah. Looking at your email, it appears 12:09

15 that you're [REDACTED] 12:09

16 [REDACTED] 12:09

17 [REDACTED]; right? 12:09

18 A. So, then, I don't remember enough to make 12:09

19 that assertion. 12:09

20 Q. Okay. Well, let's just look through your 12:09

21 tabs. The first tab you have -- these are your 12:09

22 words; right? You wrote this email? 12:09

23 A. It looks like it, yes. 12:09

24 Q. [REDACTED] and, again, "[REDACTED]" means 12:09

25 something --

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1 A. [REDACTED]. 12:09

2 Q. [REDACTED], that means [REDACTED]? 12:09

3 A. I believe [REDACTED]. 12:09

4 Q. Okay. So you have three bullets there; 12:09

5 right? 12:09

6 A. Yes. 12:09

7 Q. Okay. The first bullet is: 12:09

8 "[REDACTED] 12:10

9 [REDACTED] 12:10

10 [REDACTED]. " 12:10

11 Do you know what that refers to? 12:10

12 A. I don't remember. 12:10

13 Q. The second bullet says: 12:10

14 "[REDACTED]. " 12:10

15 Do you know what that refers to? 12:10

16 A. I don't remember. 12:10

17 Q. And the third bullet is: 12:10

18 "[REDACTED]. " 12:10

19 Do you know what that refers to? 12:10

20 A. I don't remember. 12:10

21 Q. Okay. But looking at this email, and read 12:10

22 the email, see if it refreshes your recollection. 12:10

23 It appears that you are talking about [REDACTED] 12:10

24 [REDACTED] 12:10

25 [REDACTED]; right? That's what this email 12:10

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1 is about? 12:10

2 A. Sorry. Can you say that question again? 12:10

3 Q. Yeah. Looking at this email, it appears 12:10

4 that you were involved in [REDACTED] 12:10

5 [REDACTED] 12:11

6 [REDACTED]. 12:11

7 A. I believe I was asked to pull together a 12:11

8 spreadsheet for analysis, but I don't really recall 12:11

9 like in-depth details around that. 12:11

10 Q. Do you recall your involvement in coming up 12:11

11 with [REDACTED] 12:11

12 [REDACTED] 12:11

13 [REDACTED]? 12:11

14 A. I don't remember. Again, I was 12:11

15 transitioning so I -- this was not the top of my 12:11

16 mind. 12:11

17 Q. This didn't seem important to you? 12:11

18 A. No. 12:11

19 Q. Let's look under your "[REDACTED]." 12:11

20 Your first bullet says: 12:11

21 "[REDACTED] [REDACTED] 12:11

22 [REDACTED]." 12:11

23 What are you saying there? 12:11

24 A. I am saying what it states, which is "[REDACTED] 12:11

25 [REDACTED] [REDACTED] 12:12

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1 [REDACTED]. " 12:12

2 Q. And what you mean there is [REDACTED] 12:12

3 [REDACTED], there could 12:12

4 be [REDACTED]? 12:12

5 A. Again, I -- 12:12

6 MR. FALCONER: Objection. Form. 12:12

7 THE WITNESS: -- I don't recall at the time 12:12

8 to specify exactly what it is connected to. 12:12

9 BY MR. LOESER: 12:12

10 Q. Just a blank slate for you? 12:12

11 MR. FALCONER: Objection. Form. 12:12

12 THE WITNESS: Sorry. Is that a question 12:12

13 or... 12:12

14 BY MR. LOESER: 12:12

15 Q. Yeah. Yeah. Even looking at the email that 12:12

16 you wrote about this, you just can't remember 12:12

17 anything about it? 12:12

18 A. Yes. So, again, I was transitioning to a 12:12

19 new role, so this was not the top of my mind, and I 12:12

20 don't remember this. 12:12

21 Q. Is it fair to say that it was at the top of 12:12

22 your mind when you wrote this? 12:12

23 A. I don't remember at that time. 12:12

24 Q. Well, let's look at the next bullet: 12:12

25 "[REDACTED]: [REDACTED] 12:13

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1 [REDACTED] 12:13  
2 [REDACTED]. Should 12:13  
3 decide if [REDACTED] 12:13  
4 [REDACTED] 12:13  
5 [REDACTED]. " 12:13  
6 What does it mean [REDACTED] 12:13  
7 "[REDACTED]"? 12:13  
8 A. So I can't infer what it meant at that time, 12:13  
9 but strategic value generally means something that 12:13  
10 is of business value. 12:13  
11 Q. Okay. And so you're making a recommendation 12:13  
12 here for [REDACTED] 12:13  
13 [REDACTED]; is that right? 12:13  
14 A. I don't remember specifically, so I don't 12:13  
15 know how to answer that. 12:13  
16 Q. Okay. It looks like in the email, you knew 12:13  
17 enough about what [REDACTED] 12:13  
18 use those words in this email and talk about what 12:13  
19 should happen with that? 12:14  
20 A. So, again, I don't remember enough at the 12:14  
21 time to say that was the state of my mind. I don't 12:14  
22 know. 12:14  
23 Q. And what do you mean when you say, "Should 12:14  
24 decide if [REDACTED] 12:14  
25 [REDACTED]"? 12:14

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1 MR. FALCONER: Objection. Asked and 12:14  
2 answered. 12:14  
3 THE WITNESS: Sorry. What was the question 12:14  
4 again? 12:14  
5 BY MR. LOESER: 12:14  
6 Q. So this conversation, as this email string 12:14  
7 shows, is about [REDACTED] 12:14  
8 [REDACTED]; right? 12:14  
9 A. Again, I don't remember enough to say that. 12:14  
10 I don't know. 12:14  
11 Q. Okay. You understand from the [REDACTED] 12:14  
12 document we just went through that [REDACTED] 12:14  
13 [REDACTED] 12:14  
14 [REDACTED]? 12:14  
15 MR. FALCONER: Objection. Form and 12:15  
16 foundation. 12:15  
17 THE WITNESS: So, yes, I read that, but I 12:15  
18 don't know or remember enough to connect the two 12:15  
19 directly. 12:15  
20 BY MR. LOESER: 12:15  
21 Q. What does it mean to "[REDACTED]" 12:15  
22 [REDACTED]"? 12:15  
23 A. Meaning [REDACTED]. 12:15  
24 Q. Okay. When you say "[REDACTED]," what 12:15  
25 are [REDACTED]? What does "[REDACTED]" 12:15

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1 refer to? 12:15

2 A. Like generally or... 12:15

3 Q. They're your words and your email so... 12:15

4 A. Right. So I don't -- I don't know 12:15

5 specifically in that context, but "[REDACTED]" 12:15

6 generally would mean [REDACTED]. 12:15

7 Q. Okay. So you're referring to [REDACTED] 12:16

8 [REDACTED]. 12:16

9 Do you know what that means, to [REDACTED] 12:16

10 [REDACTED]? 12:16

11 MR. FALCONER: Objection. Form. 12:16

12 THE WITNESS: Again, I don't remember. 12:16

13 BY MR. LOESER: 12:16

14 Q. You don't remember what "[REDACTED]" 12:16

15 [REDACTED] means in the email you wrote? 12:16

16 A. No. 12:16

17 Q. And so looking at these words all put 12:16

18 together in this sentence, give me your best 12:16

19 understanding of what you meant when you said, "[REDACTED]" 12:16

20 [REDACTED] 12:16

21 [REDACTED]. 12:16

22 A. Again, I can't really speculate like, at 12:16

23 that time, what I was thinking. It was in 2013, so 12:16

24 I don't remember. 12:16

25 Q. Okay. And looking at the email you wrote, 12:16

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1 it doesn't refresh your recollection at all? Just a 12:16  
2 blank slate what this email is about? 12:16  
3 A. Yes. Again, I was moving to another role so 12:16  
4 this was not top of my mind. 12:16  
5 Q. But right now, you read the email; right? 12:17  
6 You're not moving to another role right now, are 12:17  
7 you? 12:17  
8 A. No. 12:17  
9 Q. So you're able to focus right now on what 12:17  
10 this email says; right? 12:17  
11 A. Yes, I can read it. 12:17  
12 Q. And reading these words right now, you have 12:17  
13 no understanding of what it referred to? 12:17  
14 A. Correct. 12:17  
15 Q. You understand that you're under oath; 12:17  
16 right? 12:17  
17 A. Yes. 12:17  
18 MR. FALCONER: Objection. Argumentative. 12:17  
19 BY MR. LOESER: 12:17  
20 Q. Let's go to the beginning of this string. 12:17  
21 Let's look at the -- is KP an important person at 12:17  
22 Facebook? 12:17  
23 MR. FALCONER: Objection. Form. 12:17  
24 THE WITNESS: He's no longer at Facebook. 12:17  
25 / / / 12:17

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1 BY MR. LOESER: 12:17

2 Q. When he was there, if he sent you an email, 12:17

3 is that something you likely would just ignore? 12:17

4 A. I don't understand. What do you mean by 12:17

5 that? I generally try not to ignore -- 12:17

6 Q. So on August 21st, 2013 -- 12:18

7 A. -- email.

8 Q. -- when you received an email from KP, it's 12:18

9 likely that you read it; right? 12:18

10 A. I don't recall. He's at this time a partner 12:18

11 manager, so I've already moved on to working on 12:18

12 Internet.org. 12:18

13 Q. So are you saying maybe you just didn't even 12:18

14 read his email? 12:18

15 A. I don't -- I don't remember. I think it's 12:18

16 possible. I don't -- I just don't remember 12:18

17 specifically. 12:18

18 Q. Well, let's look at -- he read your email, 12:18

19 so let's look at what he said about it. If you look 12:18

20 at the second paragraph he writes: 12:18

21 "A little update from my end, and how 12:18

22 I think we should tie this to what 12:18

23 Jackie has put together." 12:18

24 Now, the "Jackie" he is referring to is you; 12:18

25 right? 12:18

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1 A. Correct. 12:18

2 Q. "Simon managed to [REDACTED] 12:18

3 [REDACTED]." 12:18

4 That means [REDACTED]; right? 12:18

5 A. I believe so. 12:18

6 Q. "... [REDACTED] 12:19

7 [REDACTED]. You 12:19

8 can see [REDACTED] 12:19

9 [REDACTED]. The most interesting [REDACTED] 12:19

10 [REDACTED] 12:19

11 [REDACTED]." 12:19

12 Do you see that? 12:19

13 A. Yes. 12:19

14 Q. Okay. Let's go down to No. 3. Can you read 12:19

15 the paragraph that's No. 3. 12:19

16 A. "[REDACTED] [REDACTED] 12:19

17 [REDACTED] 12:19

18 [REDACTED] Some of them should [REDACTED] 12:19

19 [REDACTED], 12:19

20 [REDACTED] In particular for 12:19

21 [REDACTED] we should [REDACTED] 12:19

22 [REDACTED]. 12:19

23 [REDACTED] [REDACTED] 12:19

24 [REDACTED]." 12:19

25 Q. Okay. So KP was endorsing [REDACTED] 12:20

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1 [REDACTED]; right? 12:20

2 A. That's how it reads, yes. 12:20

3 Q. And that [REDACTED] 12:20

4 [REDACTED]; is that right? 12:20

5 A. That's what it seems to be. 12:20

6 Q. And [REDACTED], those are the 12:20

7 really -- those are [REDACTED]; 12:20

8 right? 12:20

9 A. Yes. I believe so, yeah. 12:20

10 Q. Those are [REDACTED] 12:20

11 [REDACTED] then? 12:20

12 MR. FALCONER: Objection. Form. 12:20

13 THE WITNESS: I guess that's a little broad, 12:20

14 so I don't know. I think it depends. 12:20

15 BY MR. LOESER: 12:20

16 Q. Okay. But these [REDACTED] 12:20

17 [REDACTED], 12:20

18 [REDACTED]? 12:20

19 A. I believe so. 12:20

20 Q. And in -- KP's recommendation is [REDACTED] 12:20

21 [REDACTED]; right? 12:21

22 A. That's what it says, yes. 12:21

23 Q. And [REDACTED] 12:21

24 [REDACTED] 12:21

25 [REDACTED]; right? 12:21

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1 MR. FALCONER: Objection. Form. 12:21

2 THE WITNESS: So I don't remember enough 12:21

3 beyond what it says in the email. 12:21

4 BY MR. LOESER: 12:21

5 Q. All right. But what it says in the email is 12:21

6 [REDACTED] 12:21

7 [REDACTED]; right? 12:21

8 MR. FALCONER: Objection. Form and 12:21

9 foundation. 12:21

10 THE WITNESS: So I don't remember [REDACTED] 12:21

11 [REDACTED]. 12:21

12 BY MR. LOESER: 12:21

13 Q. I'm not asking you if you remember [REDACTED] 12:21

14 [REDACTED]. I'm asking you if, when he says 12:21

15 "[REDACTED]," that refers to [REDACTED] 12:21

16 [REDACTED]; right? That's -- that's 12:21

17 there -- 12:21

18 A. I -- 12:21

19 MR. FALCONER: Same objections. 12:21

20 THE WITNESS: So, again, I don't know what 12:22

21 [REDACTED]. 12:22

22 BY MR. LOESER: 12:22

23 Q. Well, now you don't know that -- when he 12:22

24 says "[REDACTED]," you're saying you 12:22

25 don't know that [REDACTED] 12:22

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1 [REDACTED]? 12:22

2 A. Yes. It was 2013. I don't remember that. 12:22

3 Q. Okay. But you just read this whole string 12:22

4 and it starts with [REDACTED] 12:22

5 [REDACTED]. And -- 12:22

6 A. It wasn't -- I think that email -- 12:22

7 MR. FALCONER: Objection. Objection. Form 12:22

8 and foundation, but go ahead. 12:22

9 THE WITNESS: I think that email is 12:22

10 referring to [REDACTED], so I don't know what 12:22

11 [REDACTED]. 12:22

12 BY MR. LOESER: 12:22

13 Q. Miss Chang, we went through the email that 12:22

14 starts this string; right? And that's the email you 12:22

15 sent. 12:22

16 A. Correct. 12:22

17 Q. Okay. In the email you sent you describe [REDACTED] 12:22

18 [REDACTED] 12:22

19 [REDACTED] 12:23

20 [REDACTED]. That was included in [REDACTED] 12:23

21 [REDACTED]; right? 12:23

22 MR. FALCONER: Objection. Form and 12:23

23 foundation. 12:23

24 THE WITNESS: So I wouldn't classify it [REDACTED] 12:23

25 [REDACTED]. It was -- it looks to be a [REDACTED] 12:23

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1 requested by Ime and Chris for me to pull together. 12:23

2 BY MR. LOESER: 12:23

3 Q. I think the email makes it pretty clear the 12:23

4 [REDACTED] 12:23

5 [REDACTED]; right? Isn't that what we 12:23

6 read? 12:23

7 A. I don't know what is specifically on that 12:23

8 [REDACTED]. 12:23

9 Q. Well, it says right in the email what's on 12:23

10 it. It says: 12:23

11 "Simon managed to [REDACTED] 12:23

12 [REDACTED] 12:23

13 [REDACTED]. You can 12:23

14 see [REDACTED]." 12:23

15 So that is what the [REDACTED] is; right? 12:23

16 MR. FALCONER: Objection. Form. 12:23

17 BY MR. LOESER: 12:23

18 Q. That is how it is described in this 12:23

19 document. 12:23

20 A. I -- 12:23

21 MR. FALCONER: Same objection. 12:23

22 THE WITNESS: So I don't know. It sounds 12:23

23 like he's referring to [REDACTED] 12:24

24 [REDACTED]. 12:24

25 / / / 12:24

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1 BY MR. LOESER: 12:24

2 Q. Right. It's attached, "[REDACTED]" 12:24

3 "[REDACTED]." Do you see that? 12:24

4 A. Correct. 12:24

5 Q. Okay. So let's look at the bottom of KP's 12:24

6 email in which he -- under No. 3 he says, "...[REDACTED]" 12:24

7 "[REDACTED]," and then let's 12:24

8 go to the bottom of this email he writes: 12:24

9 "As a general note, I think we need 12:24

10 to carry on with this exercise to 12:24

11 figure out if there are [REDACTED] 12:24

12 [REDACTED] 12:24

13 [REDACTED] 12:24

14 [REDACTED], before we can 12:24

15 make a decision for [REDACTED] in 12:24

16 [REDACTED]. For both the [REDACTED] 12:24

17 [REDACTED], we 12:24

18 can use [REDACTED] 12:24

19 [REDACTED] 12:24

20 [REDACTED] 12:24

21 [REDACTED] 12:24

22 [REDACTED]." 12:24

23 So does that make it pretty clear that what 12:24

24 KP is referring to is what you outlined below? 12:25

25 A. Yes. 12:25

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1 MR. FALCONER: Objection. Form. 12:25

2 BY MR. LOESER: 12:25

3 Q. I'm sorry. Your answer was what? 12:25

4 A. I see that's what he wrote. 12:25

5 Q. Your answer was yes; right? 12:25

6 A. Well, what was the question? 12:25

7 MR. LOESER: Will you re-read the question. 12:25

8 (Record read as follows: 12:25

9 "Q. So does that make it pretty clear 12:24

10 that what KP is referring to is what you 12:25

11 outlined before?") 12:25

12 DEPOSITION REPORTER: And I got an answer,

13 "yes." 12:25

14 MR. LOESER: As long as you got that answer. 12:25

15 MR. FALCONER: Derek, just a reminder, we 12:25

16 have about five minutes until we need to break. 12:25

17 MR. LOESER: I will just note for the record 12:25

18 that the attachment to this -- to Exhibit 7, "[REDACTED]" 12:26

19 "[REDACTED]" that was produced in 12:26

20 a native format and we have not added it as an 12:26

21 exhibit because the [REDACTED] 12:26

22 [REDACTED] 12:26

23 [REDACTED] 12:26

24 [REDACTED]. 12:26

25 / / / 12:26

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1 BY MR. LOESER: 12:26

2 Q. And Miss Chang, do you recall looking at the 12:26

3 attachment to this email and [REDACTED] 12:26

4 [REDACTED]? 12:26

5 A. No. 12:26

6 MR. LOESER: Okay. We can move on from that 12:26

7 exhibit. 12:26

8 BY MR. LOESER: 12:26

9 Q. Now, Miss Chang, you are aware that Graph 12:26

10 API version 1 was replaced with Graph API version 2; 12:27

11 right? 12:27

12 A. I don't know specifically. 12:27

13 Q. You're aware based upon the work you did 12:27

14 coming up with [REDACTED] 12:27

15 [REDACTED] 12:27

16 [REDACTED] 12:27

17 [REDACTED]; right? 12:27

18 A. So, again, I don't remember. 12:27

19 Q. You don't remember now, but you were 12:27

20 involved in that -- in those discussions in that 12:27

21 process then; right? 12:27

22 A. No, I can't make that assertion as I don't 12:27

23 remember. 12:27

24 Q. Okay. We just went through and spent quite 12:27

25 a bit of time on an email that included [REDACTED] 12:27

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1 [REDACTED] 12:27

2 [REDACTED] 12:27

3 [REDACTED]; right? 12:27

4 MR. FALCONER: Objection. Argumentative. 12:27

5 THE WITNESS: So, again, I don't know. 12:27

6 BY MR. LOESER: 12:27

7 Q. Now, Miss Chang, you were directly involved 12:28

8 in making the determination -- coming up with [REDACTED] 12:28

9 [REDACTED] 12:28

10 [REDACTED] 12:28

11 [REDACTED]; right? 12:28

12 A. So, again, I don't remember enough to say 12:28

13 that [REDACTED]. I just prepared a 12:28

14 [REDACTED] that was requested by Ime and Chris, as 12:28

15 it said in the email. 12:28

16 Q. Tell me everything you can remember about 12:28

17 your involvement in [REDACTED] 12:28

18 [REDACTED] 12:28

19 [REDACTED]. 12:28

20 A. So, again, I don't remember. I moved on to 12:28

21 Internet.org. I don't know what happened after that 12:28

22 spreadsheet. 12:28

23 Q. I didn't ask you if you remember what 12:28

24 happened after that. I am just asking you to 12:28

25 describe for me, what is the sum total of what you 12:28

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1 remember about your role in figuring out [REDACTED] 12:28

2 [REDACTED] 12:28

3 [REDACTED]. 12:29

4 A. I don't remember. 12:29

5 Q. Did you receive annual performance reviews? 12:29

6 A. In what year? 12:29

7 Q. In any year. 12:29

8 A. I received a performance review. 12:29

9 Q. And in connection with your performance 12:29

10 review, were you required to describe what you did 12:29

11 during the year that was being reviewed? 12:29

12 A. I believe so, yes. 12:29

13 Q. And in those performance reviews, were you 12:29

14 careful to make sure that you described all of the 12:29

15 important, or at least the most important things, 12:29

16 you worked on? 12:29

17 A. At that time, yes. 12:29

18 Q. And so if this [REDACTED] and 12:29

19 your role in determining [REDACTED] 12:29

20 [REDACTED] was 12:29

21 an important part of that year, that would be likely 12:29

22 discussed in the performance review? 12:30

23 A. I don't know. I can't speculate that. 12:30

24 Q. Okay. Would that be generally an accurate 12:30

25 statement, though, that the tasks that you performed 12:30

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1 that were important were likely the tasks that were 12:30  
2 discussed in your review? 12:30  
3 A. I'm not sure. I don't know. 12:30  
4 Q. What's the documentation that's created for 12:30  
5 performance reviews? 12:30  
6 A. I'm not sure I understand. 12:30  
7 Q. Do you fill something out to describe the 12:30  
8 work you've done? 12:30  
9 A. So we have a tool, a performance tool, but I 12:30  
10 don't know if that was -- I don't remember if that 12:30  
11 was there that year. 12:30  
12 Q. Do you recall -- well, what years do you 12:30  
13 recall that being there? 12:30  
14 A. I don't know -- I don't know specifically 12:30  
15 what year, but it's -- I mean, I know it exists, but 12:30  
16 I don't remember what year exactly it started. 12:30  
17 Q. Do you recall that you generally were 12:30  
18 reviewed every year? 12:31  
19 A. I don't -- I don't think so. 12:31  
20 Q. Okay. And do you recall any paperwork 12:31  
21 whatsoever being handed to you in connection with 12:31  
22 your performance reviews? 12:31  
23 A. Paperwork or... 12:31  
24 Q. Did you fill anything out at all? Did you 12:31  
25 write anything down to describe the work you did 12:31

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1       that was being reviewed? 12:31

2           A.     So, again, I think it depends on what year, 12:31

3       but there is a tool. We fill it out, so I don't -- 12:31

4       I guess if you can be more specific. 12:31

5           Q.     When you're being reviewed, do the people 12:31

6       you report to write something about you? 12:31

7           A.     Generally? 12:31

8           Q.     Generally. 12:31

9           A.     Yes. 12:31

10           MR. LOESER: Counsel, I don't think we have 12:31

11       received any performance reviews from Miss Chang, 12:31

12       and to the extent any of them discuss any of the 12:31

13       topics related to this case, we would ask to make 12:31

14       sure that those are produced. 12:32

15           MR. FALCONER: Great. And we have just hit 12:32

16       12:30, so let's go ahead and take our lunch break. 12:32

17       It's going to be an hour, so we'll be back at 1:30. 12:32

18       Maybe 1:35, but somewhere in there. 12:32

19           MR. LOESER: Okay. Can we get a count on 12:32

20       time remaining? 12:32

21           THE VIDEOGRAPHER: Sure. Would you like me 12:32

22       to do that once we go off the record or right now? 12:32

23           MR. LOESER: Yeah, that's fine. 12:32

24           THE VIDEOGRAPHER: Okay. This marks the end 12:32

25       of media No. 2 in the deposition of Jackie Chang. 12:32

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1 Off the record. The time is 12:32. 12:32

2 (Lunch recess.) 12:32

3 THE VIDEOGRAPHER: This marks the beginning 13:35

4 of media No. 3 in the deposition of Jackie Chang. 13:35

5 We are back on the record. The time is 1:35. 13:35

6 BY MR. LOESER: 13:35

7 Q. Good afternoon, Miss Chang. When we left 13:35

8 off, we were talking about Exhibit 7. And as we 13:35

9 saw, there was an attachment indicated in that 13:35

10 exhibit that, in Exhibit 7, is described as "[REDACTED] 13:35

11 [REDACTED]." 13:35

12 Do you recall our discussion of that? 13:35

13 A. Sorry. I'm just opening it up. Yes. 13:36

14 MR. LOESER: I would like to introduce as 13:36

15 Exhibit 8 the actual attachment, which we will 13:36

16 introduce as the native file Excel spreadsheet. And 13:36

17 then I will screen share and we can look through 13:36

18 some folders. This might take two hours to upload. 13:36

19 (Exhibit 8 marked for identification.) 13:36

20 MR. LOESER: Oh, look. It's already there. 13:36

21 BY MR. LOESER: 13:36

22 Q. And, Miss Chang, I will represent to you 13:36

23 that this is [REDACTED] that is 13:36

24 referred to in KP's August 21st, 2013 email. And if 13:36

25 you look at [REDACTED], there's a 13:36

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1 [REDACTED]. Are you familiar at all with 13:37  
2 Excel? 13:37  
3 A. Yes, the service, yeah. 13:37  
4 Q. And is that something -- do you use Excel 13:37  
5 regularly? 13:37  
6 A. I guess. Not lately, but yeah. 13:37  
7 Q. Do you know how to navigate your way around 13:37  
8 an Excel file? 13:37  
9 A. Yes. 13:37  
10 Q. Now, if you look at the bottom, there's a 13:37  
11 series of folders that are identified; is that 13:37  
12 right? 13:37  
13 A. Yes. 13:37  
14 Q. And do you see that it says, "[REDACTED]"? 13:37  
15 A. Yes. 13:37  
16 Q. And then there is a series of folders; the 13:37  
17 first one "[REDACTED]," the second one "[REDACTED]" 13:37  
18 "[REDACTED]," the next one, "[REDACTED]," the next one 13:37  
19 "[REDACTED]" and it goes on. And there's a whole 13:37  
20 bunch of folders. 13:37  
21 Is it fair to say that those folders are 13:37  
22 [REDACTED]? 13:37  
23 A. If you're referring to the tabs, the tabs do 13:37  
24 list [REDACTED]. 13:38  
25 Q. And are those also [REDACTED] 13:38

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1 [REDACTED]? So there's -- 13:38

2 MR. FALCONER: Objection. Form. 13:38

3 BY MR. LOESER: 13:38

4 Q. Would that be fair, [REDACTED] 13:38

5 [REDACTED]? Are 13:38

6 those -- are the words "[REDACTED]" and "[REDACTED]" kind of 13:38

7 synonymous? 13:38

8 A. I don't know. 13:38

9 Q. Okay. But if you looked at these folders, 13:38

10 you would refer to them as [REDACTED]? 13:38

11 A. Yes, they are [REDACTED], or the [REDACTED] 13:38

12 [REDACTED]. 13:38

13 Q. It looks like there's [REDACTED] 13:38

14 [REDACTED]there is [REDACTED] 13:38

15 [REDACTED]; right? 13:38

16 A. As I can see -- sorry, a question. Do I 13:38

17 have access to this fully or -- 13:39

18 Q. No. Unfortunately, we are just screen 13:39

19 sharing. 13:39

20 A. Oh, okay. Got it. 13:39

21 MR. FALCONER: It is in the Exhibit Share if 13:39

22 you want to look at it. 13:39

23 THE WITNESS: Okay. Got it. I am going to 13:39

24 open it. Okay. 13:39

25 Sorry, can you repeat your question? 13:39

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1 BY MR. LOESER:

2 Q. Yeah. If you look down at the bottom where 13:39  
3 it lists all those [REDACTED] 13:39  
4 [REDACTED], which of those types did you interact with in 13:39  
5 your role with partners? 13:39

6 A. I can't make that assertion because I 13:39  
7 wouldn't say I'm tied to a tab. 13:39

8 Q. Did you work with [REDACTED] 13:39  
9 [REDACTED]? 13:39

10 A. I worked with [REDACTED] 13:39  
11 [REDACTED], but I did not work [REDACTED] 13:39  
12 [REDACTED]. 13:39

13 Q. Okay. And over the long time that you have 13:40  
14 been working with partners, I gather that there were 13:40  
15 lots of different types of partners that you worked 13:40  
16 with that may have had a number of these different 13:40  
17 types of apps. Is that fair to say? 13:40

18 A. Sorry. I don't understand that. You mean 13:40  
19 that fall into different categories or... 13:40

20 Q. Yeah. You work maybe with [REDACTED] 13:40  
21 [REDACTED]. You work with [REDACTED] 13:40  
22 [REDACTED]; right? 13:40

23 A. No. I don't know where I could classify 13:40  
24 that with specificity. 13:40

25 Q. Can you just generally describe to me -- if 13:40

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1 you look at these different tabs, did you -- were 13:40  
2 you involved in [REDACTED] 13:40  
3 [REDACTED]? 13:40  
4 A. I recognize [REDACTED]. 13:40  
5 Q. Well, let me just pick a few and ask you. 13:40  
6 Did you interact with [REDACTED] 13:41  
7 [REDACTED]? 13:41  
8 A. Yes. I've worked with [REDACTED]. 13:41  
9 Q. Okay. Did you interact with [REDACTED] 13:41  
10 [REDACTED]? 13:41  
11 A. I worked with -- let me see. I don't 13:41  
12 remember. 13:41  
13 Q. Okay. Let's look at the "[REDACTED]" 13:41  
14 folder. Now, if we look at this folder and we go up 13:41  
15 to the top, it has an "[REDACTED]," do you see 13:41  
16 that? So, for example, "[REDACTED]." 13:41  
17 A. Yes. 13:42  
18 Q. And then there is an "[REDACTED]"; right? 13:42  
19 A. Yes. 13:42  
20 Q. And is that [REDACTED] 13:42  
21 that [REDACTED]? 13:42  
22 A. It's their [REDACTED] 13:42  
23 [REDACTED] 13:42  
24 [REDACTED]. 13:42  
25 Q. So that's like a [REDACTED] 13:42

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1 [REDACTED]? 13:42

2 A. It's an identification. 13:42

3 Q. Okay. And the next column says "MAUs." Do 13:42

4 you know what MAUs are? 13:42

5 A. Monthly active users. 13:42

6 Q. Okay. And the next column says 13:42

7 "[REDACTED]." Do you know what [REDACTED] are? 13:42

8 A. Yes. 13:42

9 Q. Okay. What are [REDACTED]? 13:42

10 A. [REDACTED] are [REDACTED] that [REDACTED] 13:42

11 [REDACTED]. 13:42

12 Q. When you say "[REDACTED]," those are 13:42

13 [REDACTED]; is that right? 13:42

14 A. So, again, I don't know the technical 13:43

15 specificity where I can make that association. But 13:43

16 my general understanding is [REDACTED] 13:43

17 [REDACTED] 13:43

18 [REDACTED], 13:43

19 [REDACTED] 13:43

20 [REDACTED]. 13:43

21 Q. Okay. So staying with [REDACTED], the 13:43

22 [REDACTED] is "[REDACTED]." You know 13:43

23 what -- 13:43

24 A. Sorry, I can't -- oh, wait. I will look at 13:43

25 yours. Sorry. 13:43

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1 Q. You see the [REDACTED], the first one is 13:43  
2 "[REDACTED]"? Like, do you have an 13:43  
3 understanding what [REDACTED] 13:43  
4 [REDACTED]? 13:43  
5 A. I don't remember. 13:43  
6 Q. What about "[REDACTED]"? What do you 13:43  
7 think that tells [REDACTED]? 13:44  
8 A. So, again, I don't remember the, like, 13:44  
9 [REDACTED]. 13:44  
10 Q. Can you hazard any kind of an educated 13:44  
11 answer as to what [REDACTED] 13:44  
12 [REDACTED]? 13:44  
13 A. I don't feel -- 13:44  
14 MR. FALCONER: Objection. 13:44  
15 THE WITNESS: Sorry. I don't feel 13:44  
16 comfortable just because I don't know the technical 13:44  
17 specifics. 13:44  
18 BY MR. LOESER: 13:44  
19 Q. Something about [REDACTED]? 13:44  
20 A. Again, I don't want to assume that. 13:44  
21 MR. LOESER: Okay. We can leave this 13:44  
22 document, as fascinating as it is. 13:44  
23 If we can go back to Exhibit 7, which is 13:44  
24 your August 21st, 2013 email. 13:44  
25 / / / 13:44

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1 BY MR. LOESER: 13:44

2 Q. And if you go to the end of the email string 13:44

3 where the -- the email that you wrote, that [REDACTED] 13:44

4 [REDACTED], I have a few questions about that. 13:44

5 First of all, you say at the beginning of 13:44

6 your email, "We're working in parallel to [REDACTED] 13:45

7 [REDACTED] 13:45

8 [REDACTED]," and then there is -- there's a link there. 13:45

9 Can you tell me what that link is? 13:45

10 MR. FALCONER: Objection. Form. 13:45

11 Go ahead, Jackie. 13:45

12 THE WITNESS: I don't know specifically. 13:45

13 BY MR. LOESER: 13:45

14 Q. And I gather in this email in native, if you 13:45

15 clicked on that hyperlink, it would take you to a 13:45

16 document? Is that how that works? 13:45

17 A. Yes, that's my understanding. 13:45

18 MR. LOESER: Counsel, I don't believe we 13:45

19 have received this document, so please make sure 13:45

20 it's been produced. 13:45

21 MR. FALCONER: We'll -- yeah. We'll look 13:45

22 into it. 13:45

23 MR. LOESER: Well, I'm asking you to do a 13:45

24 little more than look into it. If you can please 13:45

25 make sure it's produced, I would appreciate it. 13:45

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1 MR. FALCONER: Yeah. I mean, I'm not going 13:46  
2 to make that commitment to you, but like I said, 13:46  
3 I'll look into it. 13:46

4 BY MR. LOESER: 13:46

5 Q. And, Miss Chang, do you have any 13:46  
6 recollection of what that hyperlink is for or what 13:46  
7 it contains? 13:46

8 A. No, I don't remember. 13:46

9 Q. Now, again focusing on the email that you 13:46  
10 wrote and you said that you couldn't remember much 13:46  
11 about it. Is it fair to say that when you write an 13:46  
12 email, including this email, you intend to portray 13:46  
13 accurate information in your email? 13:46

14 A. I'm not sure I understand. 13:46

15 Q. Is it your practice to send email that 13:46  
16 includes false information? 13:46

17 A. I -- I don't know. I don't really 13:46  
18 understand that question. 13:46

19 Q. Is it your general practice when you're 13:46  
20 communicating with your colleagues to send them an 13:46  
21 email that contains false information? 13:46

22 A. I -- I don't know. I -- I usually don't 13:47  
23 have that intention. 13:47

24 Q. And so when you wrote this email, is it fair 13:47  
25 to assume that you were endeavoring to communicate 13:47

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1 accurate information? 13:47

2 MR. FALCONER: Objection. Form. 13:47

3 THE WITNESS: So, again, I don't -- like I 13:47

4 don't remember this. I don't want to assume like -- 13:47

5 yeah, I don't want to assume anything. 13:47

6 BY MR. LOESER: 13:47

7 Q. I'm not asking you if you remember this 13:47

8 email. I'm asking you if -- you sent this email; 13:47

9 right? 13:47

10 A. That's what it says. 13:47

11 Q. And it was your general practice when 13:47

12 sending email to communicate accurate information; 13:47

13 right? 13:47

14 A. Yes. 13:47

15 Q. And it was not your general practice to 13:47

16 communicate information that you knew to be false; 13:47

17 right? 13:47

18 A. Again, I feel like that's -- I don't know. 13:47

19 Like I don't know what the information is, so my 13:47

20 intent generally is not -- I don't know the 13:47

21 information itself. 13:48

22 Q. Right. I'm not asking you if the 13:48

23 information is or isn't false. I'm asking you if it 13:48

24 is your intent to generally communicate accurate 13:48

25 information in your -- 13:48

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1	A. It is my intent to, yes, provide	13:48
2	information.	13:48

5	Is there something else that you can think	13:48
6	of that would refresh your recollection regarding	13:48
7	the events discussed in this email?	13:48

9	Q. And so would you agree that this email is	13:48
10	the best evidence, that you're aware of, of what you	13:48
11	knew and were thinking at the time regarding these	13:48
12	topics?	13:48

15	THE WITNESS: So, again, I can't make that	13:48
16	assumption.	13:48

18	Q. You can't make the assumption that this	13:48
19	email is the best evidence of what you were thinking	13:48
20	at the time you wrote the email?	13:48

22 Q. But you can't remember -- you can't identify 13:49  
23 anything else that would be a more accurate 13:49  
24 reflection of what you were thinking at the time you 13:49  
25 wrote this email? 13:49

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1           A.     Correct. I don't -- I don't know, so I           13:49  
2     don't know what the expanse is.                           13:49

3           Q.     Is it fair to say that if this email doesn't 13:49  
4     refresh your recollection of the events at the time, 13:49  
5     you're not aware of anything else that would?           13:49

6           A.     I don't -- I don't know.                   13:49

7           Q.     You don't know if there is any other       13:49  
8     evidence that would refresh your recollection?       13:49

9           A.     That question would assume I would know,   13:49  
10    which I don't know.                                       13:49

11          Q.     But I'm asking you, do you know of any other 13:49  
12    evidence that would refresh your recollection?       13:49

13          A.     I don't know.                               13:49

14          Q.     You don't know if there is any other       13:49  
15    evidence that would refresh your recollection?       13:49

16          A.     Again, I don't know what I don't know, so I 13:49  
17    can't make that assumption that I would know.       13:49

18          Q.     And if there were something else that might 13:50  
19    refresh your recollection, what might that be?       13:50

20               MR. FALCONER: Objection. Asked and           13:50  
21    answered. Lack of foundation.                           13:50

22    BY MR. LOESER:   13:50

23          Q.     You didn't -- there's not like a recorded   13:50  
24    transcripts of communications that you had, as far   13:50  
25    as you know, is there?                                   13:50

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1 A. I don't -- to my knowledge, I don't think 13:50

2 so. 13:50

7	MR. FALCONER: Objection. Form and	13:50
8	foundation.	13:50

11	BY MR. LOESER:	13:50
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16 A. Well, that would require me to speculate. 13:51

18	A. You're asking me if I know if this is the	13:51
19	best, which would assume I know what everything is	13:51
20	and I don't know what everything is, so I don't	13:51
21	know. So I can't make that assumption.	13:51

22	Q. Let me be specific. Would you agree that	13:51
23	this email is a good guide of what you were thinking	13:51
24	about the topics discussed in the email at the time	13:51
25	you sent the email?	13:51

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1 MR. FALCONER: Objection. Form. Foundation 13:51  
2 and asked and answered. 13:51  
3 THE WITNESS: Again, when you say "good," I 13:51  
4 don't know where I could like -- where I could say I 13:51  
5 know what a definition of good means. 13:51  
6 BY MR. LOESER: 13:51  
7 Q. I will try one more time. Would you agree 13:51  
8 that the email that you wrote is evidence of what 13:51  
9 you were thinking about the subjects discussed in 13:51  
10 your email at the time you sent the email? 13:52  
11 MR. FALCONER: Objection. Excuse me. 13:52  
12 Objection. Form. 13:52  
13 THE WITNESS: Again, I don't remember. I 13:52  
14 know the email is there, so I don't want to 13:52  
15 speculate what I was thinking because I don't know. 13:52  
16 BY MR. LOESER: 13:52  
17 Q. Do you ever go back and read your old emails 13:52  
18 to try and understand what you were thinking at some 13:52  
19 earlier time? 13:52  
20 A. Generally, no. I have a lot of emails. 13:52  
21 Q. Have you ever done that? 13:52  
22 A. Have I ever looked at an email? 13:52  
23 Q. Have you ever gone back and looked at an 13:52  
24 email you wrote earlier to refresh your recollection 13:52  
25 about what you were thinking at the time on a 13:52

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1 subject? 13:52

2 A. I have done that. 13:52

3 Q. And when you've done that, have you found 13:52

4 that you're able to refresh your recollection about 13:53

5 something you were thinking by reading your old 13:53

6 email? 13:53

7 A. That depends. It depends on whether that 13:53

8 situation was relevant to me at the time. So if 13:53

9 it's tied to this specific scenario, again, I was 13:53

10 working on a lot of different things, so I don't 13:53

11 remember this specific -- and I don't know if that 13:53

12 would be relevant for that specific type of example. 13:53

13 Q. So I looked through your communication here 13:53

14 to folks, Chris Daniels, KP, Ime Archibong. I don't 13:53

15 see any reference here -- there is nothing in this 13:53

16 string that tells them not to rely on the 13:53

17 information that you wrote because you were 13:53

18 transitioning to another job; is that right? 13:53

19 A. I don't think I understand. 13:53

20 Q. Do you need the question read back? 13:53

21 A. Well, I can tell you, I don't understand the 13:54

22 intent of the question. 13:54

23 Q. How about just answer the question. 13:54

24 A. I don't know. 13:54

25 Q. You don't know if you said somewhere in this 13:54

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1 email to your colleagues not to rely on the 13:54  
2 information that you provided in the email? 13:54  
3 Wouldn't that be -- if you had said that, wouldn't 13:54  
4 that be like visible on the page we are looking at? 13:54  
5 A. So I didn't write that, but I don't know 13:54  
6 what the intent of the question is. I don't think I 13:54  
7 write emails with caveats in mind. 13:54  
8 Q. The question is really simple. Did you tell 13:54  
9 your colleagues when you sent them this email, did 13:54  
10 you write in the email, "Don't rely on the 13:54  
11 information I'm providing because I'm transitioning 13:54  
12 to the job"? It is a yes-or-no question. 13:54  
13 A. I didn't write that specifically as -- as 13:54  
14 it's in the document. 13:54  
15 MR. FALCONER: Sorry, I think my audio is 13:54  
16 out. I had an objection to that last question as 13:55  
17 argumentative. 13:55  
18 MR. LOESER: We can go to Exhibit 9. I will 13:55  
19 have this document marked as Exhibit 9. This is an 13:55  
20 email from Brendan Moore to you, dated April 24th, 13:55  
21 2013. 13:55  
22 MR. FALCONER: Derek, I apologize. I'm 13:55  
23 having a hard time hearing you. Is there any way 13:55  
24 you can turn up your audio or move closer to the mic 13:55  
25 or anything? 13:55

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1 MR. LOESER: Let me try and change -- is 13:55  
2 that any clearer? 13:55  
3 MR. FALCONER: Yeah. That's a little 13:55  
4 better. Thank you. 13:55  
5 (Exhibit 9 marked for identification.) 13:55  
6 BY MR. LOESER: 13:55  
7 Q. Miss Chang, you are looking at an email from 13:55  
8 Brendan Moore to, it looks like, himself and also to 13:56  
9 you, dated April 24th, 2013. Subject, "Message 13:56  
10 Summary" with a long number. 13:56  
11 Do you see that? 13:56  
12 A. Yes. 13:56  
13 Q. Who is Brendan Moore? 13:56  
14 A. He was a colleague of mine. 13:56  
15 Q. Okay. Do you know what his job was at the 13:56  
16 time? 13:56  
17 A. He was a data analyst. I don't know if he 13:56  
18 was an intern or full time at the time. 13:56  
19 Q. And this email, it looks like it forwards a 13:56  
20 chat; is that -- is that right? 13:56  
21 A. It looks to be. I'm not sure. 13:56  
22 Q. Okay. And it appears that you had -- you 13:56  
23 were communicating with Mr. Moore via chat and that 13:56  
24 he sent that communication to himself and to you; is 13:56  
25 that right? 13:56

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1 MR. FALCONER: Objection. Foundation. 13:56

2 THE WITNESS: I don't know what his intent 13:57

3 was. I don't know if that was true or not. 13:57

4 BY MR. LOESER: 13:57

5 Q. Well, I'm not asking about his intent. I'm 13:57

6 just looking at the document and trying to 13:57

7 understand what it is. Does it appear to reproduce 13:57

8 a chat that you had with Mr. Moore? 13:57

9 A. I don't know. 13:57

10 Q. Okay. 13:57

11 MR. FALCONER: Derek, can I -- if I 13:57

12 represent that this is just how chats get produced 13:57

13 in discovery, does that help? Is that helpful? 13:57

14 MR. LOESER: That is. Thank you. 13:57

15 BY MR. LOESER: 13:57

16 Q. If you look at the first line of the chat, 13:57

17 it's from you and it says: 13:57

18 "Question - so for the [REDACTED] - 13:57

19 I noticed a [REDACTED] 13:57

20 [REDACTED]." 13:57

21 Do you recall what the [REDACTED] was? 13:57

22 A. No, I don't. 13:57

23 Q. And you don't have any recollection of the 13:57

24 [REDACTED] 13:57

25 [REDACTED]? 13:57

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1 A. No. 13:57

2 Q. If we page down the chat, there's a line in 13:57

3 which you say: 13:58

4 " [REDACTED] ." 13:58

5 That's on the second page, about the middle 13:58

6 of the page. Actually, I think it is the third 13:58

7 page. Third page. I'm sorry. There it is. 13:58

8 Do you see that? 13:58

9 A. Yes. 13:58

10 Q. And do you recall anything about this 13:58

11 conversation about [REDACTED] 13:58

12 [REDACTED]? 13:58

13 A. I don't recall this. 13:58

14 Q. And if you look down, right below your 13:58

15 [REDACTED], 13:58

16 Mr. Moore says: 13:59

17 "Some of those [REDACTED] ." 13:59

18 Do you recall what the "[REDACTED]" was? 13:59

19 A. I know what [REDACTED] is generally, but I don't 13:59

20 know which one he's referring to. 13:59

21 Q. Okay. What is GK generally? 13:59

22 A. A gatekeeper. 13:59

23 Q. Okay. And what is that? 13:59

24 A. I don't know the technicals behind that, so 13:59

25 I'm sure I'm explaining incorrectly, but from what I 13:59

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1 understand, it's some sort of permissioning -- 13:59  
2 permissioning system. 13:59  
3 Q. Permissioning for partners to get access to 13:59  
4 permissions; is that right? 13:59  
5 A. Again, I don't know where I can make that 13:59  
6 assertion. It's more technical than I'm familiar 13:59  
7 with. 13:59  
8 Q. Okay. And right after he says, "[REDACTED]" 13:59  
9 "[REDACTED]," Mr. Moore says, "[REDACTED]" 13:59  
10 "[REDACTED]" 13:59  
11 "[REDACTED]." 14:00  
12 Do you know what the "[REDACTED]" 14:00  
13 is? 14:00  
14 A. No. 14:00  
15 Q. Okay. Paging down a little further, 14:00  
16 Mr. Moore says: 14:00  
17 "My personal belief is that [REDACTED]" 14:00  
18 "[REDACTED]" 14:00  
19 "[REDACTED]" 14:00  
20 "[REDACTED]." 14:00  
21 Do you know what a "[REDACTED]" 14:00  
22 refers to? 14:00  
23 A. No. 14:00  
24 Q. No idea? That is not a term you ever used? 14:00  
25 No understanding of it whatsoever? 14:00

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1 A. I just don't remember. 14:00

2 Q. Do you know what a "vertical" is? 14:00

3 A. A vertical, I think it depends on what 14:00

4 context it's being used. 14:00

5 Q. Well, here it's being used in the context of 14:00

6 apps. So do you know what it means in that context? 14:00

7 A. Again, I don't remember. 14:00

8 Q. Just no idea at all; is that what you are 14:00

9 saying? 14:00

10 A. Correct. 14:00

11 MR. FALCONER: Objection. Asked and 14:00

12 answered. 14:00

13 BY MR. LOESER: 14:00

14 Q. Okay. And then you respond: 14:00

15 " [REDACTED] 14:01

16 [REDACTED]. " 14:01

17 So do you know what you were talking about 14:01

18 there? 14:01

19 A. Again, I don't remember. 14:01

20 Q. On the next page, you say: 14:01

21 "From developer and platform growth, 14:01

22 on our end there are [REDACTED] 14:01

23 [REDACTED]. " 14:01

24 What did you mean by "[REDACTED] 14:01

25 [REDACTED]"? Let me help you with that. Your 14:01

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1 next line says "[REDACTED]" 14:01

2 [REDACTED]. " 14:01

3 So what do you mean by "[REDACTED]" 14:01

4 [REDACTED] 14:01

5 [REDACTED]. " 14:01

6 A. Sorry. I hear some background sounds. 14:01

7 So, again, I don't know. 14:02

8 Q. Okay. What do you think you meant by 14:02

9 "[REDACTED]"? 14:02

10 You worked with a lot of partners over a long period 14:02

11 of time. Do you have any understanding of what it 14:02

12 is for [REDACTED] 14:02

13 [REDACTED]? 14:02

14 A. So, again, I don't remember, so I don't 14:02

15 really -- I can't really guess. 14:02

16 Q. So if someone said to you today, "Jackie, 14:02

17 [REDACTED], " 14:02

18 would you have any idea what they meant? 14:02

19 A. Probably not. 14:02

20 Q. If you turn to the next page of the chat, in 14:02

21 the middle, Mr. Moore writes: 14:02

22 "We don't want the tail to wag the dog. 14:02

23 The first priority is [REDACTED] 14:02

24 [REDACTED]. The second priority is 14:02

25 [REDACTED]. " 14:02

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1 Did you agree that the first priority for 14:02  
2 Facebook was [REDACTED]? 14:03  
3 A. So, again, I don't really remember this 14:03  
4 conversation, so I don't really recall this. 14:03  
5 Q. Let's keep going. Right below that you say: 14:03  
6 "To be honest -- I don't think [REDACTED] 14:03  
7 [REDACTED]. [REDACTED] 14:03  
8 [REDACTED]." 14:03  
9 So what were you saying there? 14:03  
10 A. Again, I can't really speculate because I 14:03  
11 don't remember. 14:03  
12 Q. Do you think that [REDACTED] 14:03  
13 [REDACTED]? 14:03  
14 A. Again, I don't remember the context. I 14:03  
15 don't know. 14:03  
16 Q. And you say: 14:03  
17 "[REDACTED]." 14:03  
18 So did you know what those words meant? 14:03  
19 A. Again, I don't remember, so I don't -- I 14:03  
20 can't really assume. 14:03  
21 Q. So let's just look at this conversation 14:04  
22 though and think for a minute. When you wrote these 14:04  
23 words "to be honest -- I don't think [REDACTED] 14:04  
24 [REDACTED]. [REDACTED] 14:04  
25 [REDACTED]," you are telling the jury that you 14:04

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1 have utterly no understanding of what you meant by 14:04  
2 that? 14:04  
3 MR. FALCONER: Objection. Form and asked 14:04  
4 and answered. 14:04  
5 THE WITNESS: So I don't remember this chat 14:04  
6 specifically. 14:04  
7 BY MR. LOESER: 14:04  
8 Q. I'm not asking you if you remember this chat 14:04  
9 specifically. Do you need me to read the question 14:04  
10 back? 14:04  
11 A. Yes. 14:04  
12 MR. LOESER: Miss Jennings, would you please 14:04  
13 read that question back. 14:04  
14 (Record read as follows: 14:04  
15 "Q. So let's just look at this 14:04  
16 conversation though and think for a 14:04  
17 minute. When you wrote these words 'to be 14:04  
18 honest, I don't think [REDACTED] 14:04  
19 [REDACTED]. [REDACTED] 14:04  
20 [REDACTED], 'you are telling the 14:04  
21 jury that you have utterly no 14:04  
22 understanding what you meant by that?") 14:04  
23 MR. FALCONER: Same objections. 14:05  
24 THE WITNESS: Yes. Because I don't 14:05  
25 remember. 14:05

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1 BY MR. LOESER: 14:05

2 Q. Go down a little further in your chat. You 14:05

3 say: 14:05

4 "Well, I think [REDACTED] 14:05

5 Facebook goal #1: [REDACTED] 14:05

6 [REDACTED]. But it doesn't 14:05

7 help with #2: [REDACTED]. 14:05

8 Sorry for my rant." 14:05

9 So, Miss Chang, what did you mean by 14:05

10 Facebook "Goal #1, [REDACTED] 14:05

11 [REDACTED]"? 14:05

12 A. So, again, I don't remember. 14:05

13 Q. And as you sit here today, you have utterly 14:05

14 no understanding of what it would mean [REDACTED] 14:05

15 [REDACTED]? 14:05

16 A. Not in this context of this message. 14:05

17 Q. Do you have any understanding of it in any 14:05

18 context? 14:05

19 A. Well, [REDACTED] 14:05

20 [REDACTED] I know what that 14:06

21 means, but I don't know it in the context of this 14:06

22 message. 14:06

23 Q. What does that mean? 14:06

24 A. It means I don't remember this conversation. 14:06

25 Q. I know, but you said you didn't understand 14:06

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1 it in this context. But what does it mean to you 14:06  
2 right now, as you sit here today, [REDACTED] 14:06  
3 [REDACTED]? 14:06  
4 A. It means -- it means the same exact thing as 14:06  
5 it says, which is [REDACTED]. 14:06  
6 Q. What does "[REDACTED]" mean? 14:06  
7 A. [REDACTED]. 14:06  
8 Q. Okay. [REDACTED]; is 14:06  
9 that right? 14:06  
10 A. Not necessarily. To me, it means like 14:06  
11 [REDACTED]. 14:06  
12 Q. [REDACTED]? 14:06  
13 A. [REDACTED]. 14:06  
14 Q. [REDACTED]? 14:06  
15 A. [REDACTED]. 14:06  
16 Q. Okay. And when you say, "[REDACTED] 14:06  
17 [REDACTED]," what does that mean to you? What does it 14:06  
18 mean to "[REDACTED]"? 14:06  
19 A. I don't remember. 14:06  
20 Q. Well, you still work at Facebook. So as you 14:07  
21 sit here today right now, what does "[REDACTED] 14:07  
22 [REDACTED]" mean to you? 14:07  
23 A. It doesn't mean a lot because I don't work 14:07  
24 on -- I don't work on ads, and I don't work on the 14:07  
25 platform. 14:07

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1 Q. So are you telling the jury that the phrase 14:07  
2 "[REDACTED]" has utterly no meaning to you 14:07  
3 now? 14:07

4 A. Yes. 14:07

5 MR. FALCONER: Objection. Asked and 14:07  
6 answered and argumentative. 14:07

7 BY MR. LOESER: 14:07

8 Q. Which part of it, is it the "[REDACTED]" or 14:07  
9 the "[REDACTED]" that has no meaning to you? 14:07

10 A. Both. I just don't remember this 14:07  
11 conversation, so I don't know what the context of it 14:07  
12 is. 14:07

13 Q. Right. I'm not asking about the 14:07  
14 conversation. I'm asking you about the words 14:07  
15 "[REDACTED]" and I just want to make sure it's 14:07  
16 clear for the jury what you are saying. 14:07

17 You have no understanding whatsoever about 14:07  
18 what "[REDACTED]" means? 14:07

19 MR. FALCONER: Same objections. 14:07

20 THE WITNESS: Correct. In this context, I 14:07  
21 don't know what it means. 14:07

22 BY MR. LOESER: 14:08

23 Q. I'm not asking you about this context. I'm 14:08  
24 asking you at all. Do you have an understanding of 14:08  
25 those terms at all? 14:08

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1	A. So, again, I don't remember this	14:09
2	conversation so I don't -- I don't know in that	14:09
3	context.	14:09

7                   You used the term "[REDACTED]."    You    14:09  
8    don't remember what it means now, but is it fair to    14:09  
9    say you knew what it meant when you wrote this chat? 14:09

11 THE WITNESS: Again, I don't know. 14:09

13	Q. What don't you know?	14:09
----	-------------------------	-------

15	Q. Really?	14:09
----	------------	-------

17 Q. My question is if you understand -- when you 14:09  
18 wrote the words "[REDACTED]" if you understood 14:09  
19 what that meant when you wrote it? 14:09

22 THE WITNESS: So I don't know what the state 14:10  
23 of my mind was at that time, so I can't speculate 14:10  
24 that. 14:10

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1 BY MR. LOESER: 14:10

2 Q. But it's fair to say it was not your general 14:10

3 practice to use words that you didn't understand; 14:10

4 right? 14:10

5 A. I don't -- again, I don't -- I don't know 14:10

6 what you mean by that. 14:10

7 Q. It might have been your general practice to 14:10

8 use words you don't understand? 14:10

9 A. I think it's possible to use words I don't 14:10

10 fully understand, yes. 14:10

11 Q. Do you recall ever talking to any of your 14:10

12 other colleagues ever about what [REDACTED] 14:10

13 means to Facebook? 14:10

14 A. I don't remember. 14:10

15 MR. LOESER: The next exhibit is Exhibit 10. 14:11

16 (Exhibit 10 marked for identification.) 14:11

17 BY MR. LOESER: 14:11

18 Q. For the record, Exhibit 10 is an email from 14:11

19 KP to Miss Chang, dated August 23rd, 2013, Subject 14:11

20 line, "Re: [REDACTED]." 14:11

21 And looking at the subject line, which is 14:12

22 one we've seen before, can you explain what 14:12

23 "[REDACTED]" means? 14:12

24 A. I think, like I said before, I mean, it 14:12

25 means like [REDACTED]. 14:12

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1 Q. And the reference to "[REDACTED]," take a 14:12  
2 minute to look at the email string. It might help 14:12  
3 you answer the questions if you haven't already. 14:12

4 A. Okay. Okay. 14:12

5 Q. Okay. Now, as we -- as I mentioned a moment 14:14  
6 ago, this is an email from KP to you that starts an 14:14  
7 email string. And the subject is the same as the 14:14  
8 subject of the earlier August 21st email that we 14:14  
9 talked about. 14:14

10 And if you go down to the email at the 14:14  
11 bottom of the first page, or midway through the 14:14  
12 first page, it's an email from you to Chris Daniels, 14:14  
13 Ime Archibong and KP, with a CC to Simon Cross, 14:14  
14 dated August 22nd, 2013. Do you see that? 14:14

15 A. Yes. 14:14

16 Q. And it has that same subject, "[REDACTED]/[REDACTED] 14:14  
17 [REDACTED]"; right? 14:14

18 A. Yes. 14:14

19 Q. And if you look at the second paragraph -- 14:15  
20 let's look at the first paragraph. You write: 14:15

21 "I don't think we should [REDACTED] 14:15

22 [REDACTED] yet until we 14:15

23 are in agreement [REDACTED] 14:15

24 [REDACTED] 14:15

25 [REDACTED] 14:15

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1 [REDACTED]. For 14:15  
2 tomorrow's meeting, I promised 14:15  
3 Constantin that I'd provide him a 14:15  
4 recommendation for our team - if you 14:15  
5 don't see any issues, I'm going to 14:15  
6 give him our top-level doc." 14:15  
7 Do you see that? 14:15  
8 A. Yes. 14:15  
9 Q. So this shows, again, your involvement in  
10 this subject of [REDACTED]  
11 [REDACTED]; right?  
12 A. It appears so, yes. 14:15  
13 Q. Okay. And if you look down your email a 14:15  
14 little further, you say: 14:15  
15 "For this meeting, I'd like to ensure 14:15  
16 a couple things are accomplished." 14:15  
17 Could you read your first paragraph there, 14:16  
18 No. 1? 14:16  
19 A. "[REDACTED] [REDACTED] 14:16  
20 [REDACTED] 14:16  
21 [REDACTED], 14:16  
22 [REDACTED]. I need to 14:16  
23 provide feedback for [REDACTED] 14:16  
24 by Monday and how they should move 14:16  
25 forward. 14:16

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1 " [REDACTED] 14:16

2 [REDACTED] - it seems our general 14:16

3 recommendation will be [REDACTED]

4 [REDACTED]; however, it

5 would be good to understand our

6 [REDACTED]

7 [REDACTED]. [REDACTED] 14:16

8 is an interesting case, where [REDACTED] 14:16

9 [REDACTED] 14:16

10 [REDACTED] 14:16

11 [REDACTED]. " 14:16

12 Q. Okay. So you are discussing [REDACTED] 14:16

13 [REDACTED] and that -- fair to say that these are 14:16

14 referred to as [REDACTED] 14:16

15 [REDACTED]? 14:16

16 A. Again, I don't remember, so I don't know if 14:16

17 these are specifically special cases. 14:16

18 Q. Okay. But that's the subject of the email 14:16

19 and that's the information that's below that 14:16

20 subject; right? 14:16

21 A. That is the subject, but I don't know if 14:16

22 that's still the context. 14:17

23 Q. Okay. And when you say, "[REDACTED] 14:17

24 [REDACTED], " what was "[REDACTED]"? 14:17

25 A. I don't remember. 14:17

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1 Q. Utterly no recollection whatsoever what 14:17  
2 "[REDACTED]" was? 14:17  
3 A. Correct. 14:17  
4 Q. And when you say, "[REDACTED]" 14:17  
5 [REDACTED] 14:17  
6 [REDACTED] 14:17  
7 [REDACTED], " does that mean that [REDACTED] 14:17  
8 [REDACTED], the 14:17  
9 [REDACTED] 14:17  
10 [REDACTED]? 14:17  
11 A. Again, I don't remember, so I don't know 14:17  
12 specifically if it's the intent you laid out. 14:17  
13 Q. Is that what those words mean to you that I 14:17  
14 just read on the page? Do you want me to read -- 14:17  
15 A. No. 14:18  
16 Q. I will read it again. You tell me if that's 14:18  
17 what those words seem to mean to you, words that you 14:18  
18 wrote. 14:18  
19 "[REDACTED]" 14:18  
20 [REDACTED] 14:18  
21 [REDACTED] 14:18  
22 [REDACTED]. " 14:18  
23 What do those words mean to you right now 14:18  
24 when you read them? 14:18  
25 A. It means what it says. That "[REDACTED]" 14:18

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1 [REDACTED] 14:18

2 [REDACTED] 14:18

3 [REDACTED]. " 14:18

4 Q. So that perhaps made it [REDACTED] 14:18

5 [REDACTED]; right? 14:18

6 A. So I don't remember, so I don't -- I can't 14:18

7 draw that conclusion. I don't know. 14:18

8 Q. Can you read No. 2 item in your email. 14:18

9 A. "2/[REDACTED] 14:18

10 [REDACTED]: 14:19

11 "[REDACTED]. 14:19

12 "[REDACTED] (i.e. 14:19

13 [REDACTED]). 14:19

14 "[REDACTED]ategic 14:19

15 (i.e. [REDACTED]). 14:19

16 "[REDACTED] (i.e. 14:19

17 [REDACTED]). 14:19

18 "[REDACTED] 14:19

19 (i.e. [REDACTED], etc.)" 14:19

20 Q. You can stop there. 14:19

21 And you indicate that you need to determine 14:19

22 a [REDACTED] 14:19

23 [REDACTED]. [REDACTED] 14:19

24 [REDACTED] that you were 14:19

25 referring to? 14:19

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1           A.     So, again, I don't remember, so I don't know 14:19  
2     if that's -- if that's all categories or whatever 14:19  
3     it's saying. 14:20

4           Q.     And what did you mean by "[REDACTED]"? 14:20

5           A.     I don't remember the context of it, so I 14:20  
6     don't -- I don't know. 14:20

7           Q.     And can you explain [REDACTED] 14:20  
8     [REDACTED] as that's used in 14:20  
9     the -- when you describe different categories? 14:20

10          A.     No, I don't remember. 14:20

11          Q.     And as you sit here today, as someone still 14:20  
12     working for Facebook, can you explain [REDACTED] 14:20  
13     [REDACTED]? 14:20

14          A.     So I think it would depend on the context in 14:20  
15     terms of how we're working with them. 14:20

16          Q.     So what would it mean in the context of 14:20  
17     considering [REDACTED] 14:20  
18     [REDACTED]? 14:20

19                 MR. FALCONER: Objection. Asked and 14:20  
20     answered. 14:20

21                 THE WITNESS: So, again, I don't remember, 14:20  
22     so I don't -- I can't speculate on that. 14:21

23                 BY MR. LOESER: 14:21

24          Q.     And, then, next in your email you say: 14:21

25                 "We should also ensure that we actively 14:21

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1 collaborate with Product & PMM..." 14:21

2 What is "Product and PMM"? 14:21

3 A. Product managers and PMM, partner marketing 14:21

4 managers. 14:21

5 Q. Okay. So looking at the beginning of your 14:21

6 email, you communicate to your -- the recipients of 14:21

7 this email that you would like to "ensure a couple 14:21

8 things are accomplished"; is that right? 14:21

9 A. For the meeting. 14:21

10 Q. Okay. 14:21

11 A. Yeah, for the meeting tomorrow, yeah. 14:21

12 Q. And you were involved enough in this process 14:21

13 to communicate to your colleagues what you would 14:21

14 like to see accomplished; is that right? 14:21

15 A. Well, like I said, it says "for a meeting 14:21

16 tomorrow" and what I want to accomplish for that 14:22

17 meeting. 14:22

18 Q. Okay. And then down below when you say, 14:22

19 "We should also ensure that we actively collaborate 14:22

20 with Product & PMM," is that a recommendation from 14:22

21 you that you want to -- when you say we want to 14:22

22 "ensure that we actively collaborate," is that you 14:22

23 instructing or guiding this group of people on 14:22

24 something that should happen? 14:22

25 A. It sounds like it's a recommendation. 14:22

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1 MR. LOESER: We can put that document aside, 14:22  
2 and I will introduce Exhibit 11, which for the 14:22  
3 record is an email from Simon Cross to Ime 14:22  
4 Archibong, Jackie Chang, and KP, dated September 14:22  
5 3rd, 2013, with the subject line "Re: [REDACTED] 14:22  
6 [REDACTED]. " 14:23

7 (Exhibit 11 marked for identification.) 14:23

8 BY MR. LOESER: 14:23

9 Q. So, Miss Chang, if you look at this email, 14:23  
10 who is Simon Cross? 14:23

11 A. He was a colleague. 14:23

12 Q. Okay. Was he in the same department or do 14:23  
13 you recall what his position was? 14:23

14 A. I think he was a partner manager at this 14:23  
15 time. 14:23

16 Q. Okay. Does that mean you were reporting to 14:23  
17 him or he was reporting to you? 14:23

18 A. I was reporting to Ime and I had no reports. 14:23

19 Q. Okay. And so Simon Cross sends a slide deck 14:23  
20 about [REDACTED] and it goes to, among 14:23  
21 other people, yourself; is that right? 14:23

22 A. That's what it looks like. 14:23

23 Q. Okay. And if you look down the page a bit, 14:24  
24 it looks like they're planning a meeting for [REDACTED] 14:24  
25 [REDACTED] and they reschedule it so you can 14:24

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1 make it; is that right? 14:24

2 A. That's what it looks like. 14:24

3 MR. FALCONER: Objection. Foundation. 14:24

4 MR. LOESER: All right. Let's turn to the 14:24

5 attachment, which we will introduce as Exhibit 12. 14:24

6 (Exhibit 12 marked for identification.) 14:24

7 BY MR. LOESER: 14:24

8 Q. And I will represent for the record, 14:24

9 Miss Chang, that Exhibit 12 is the document that was 14:24

10 attached to Mr. Cross' email that went to you, among 14:24

11 others. 14:24

12 And this slide deck is titled, "[REDACTED] 14:24

13 [REDACTED]." 14:24

14 Did I read that right? 14:25

15 A. Yes. 14:25

16 Q. And you received this slide deck, as 14:25

17 reflected in the cover email, on September 3rd, 14:25

18 2013; right? 14:25

19 A. If that's what it says in the email. 14:25

20 Q. So if you go to the second page of the slide 14:25

21 deck, after the -- first page after the title page, 14:25

22 and the slide is captioned "2 separate pieces of 14:25

23 work." 14:25

24 Do you see that? 14:25

25 A. Yes. 14:25

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1 Q. And under the heading, "[REDACTED]" 14:25  
2 [REDACTED], " can -- the first bullet says, "[REDACTED]" 14:25  
3 [REDACTED], " then "[REDACTED]" 14:25  
4 [REDACTED]? "GOAL: [REDACTED], [REDACTED]" 14:25  
5 [REDACTED]. " 14:26  
6 Do you see that? 14:26  
7 A. Yes. 14:26  
8 Q. And, Miss Chang, do you recall being 14:26  
9 involved in [REDACTED]" 14:26  
10 [REDACTED]? 14:26  
11 A. No, I don't recall. 14:26  
12 Q. And do you recall [REDACTED]" 14:26  
13 [REDACTED]? 14:26  
14 A. I don't remember. 14:26  
15 Q. Do you remember anything at all about any 14:26  
16 involvement you had in the subject matter of [REDACTED]" 14:26  
17 [REDACTED]? 14:26  
18 A. Sorry. Can you state that question again? 14:26  
19 Q. Do you remember being involved in any way in 14:26  
20 [REDACTED]? 14:26  
21 A. Not -- I don't remember. 14:26  
22 Q. This slide over on the right side refers to 14:27  
23 "[REDACTED]. " 14:27  
24 Was [REDACTED] a [REDACTED]" 14:27  
25 [REDACTED]? 14:27

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1 A. Again, I don't remember. 14:27

2 Q. Turn to the next slide. The heading is, 14:27

3 " [REDACTED] ". 14:27

4 Do you see that? 14:27

5 A. Yes. 14:27

6 Q. And if you look, there is a table in the 14:27

7 middle for " [REDACTED] ," and it states: 14:27

8 "Currently, [REDACTED] 14:28

9 [REDACTED] 14:28

10 [REDACTED] ". 14:28

11 Do you see that? 14:28

12 A. Yes. 14:28

13 Q. And do you remember the role you played in 14:28

14 [REDACTED]? 14:28

15 A. No. 14:28

16 MR. FALCONER: Objection. Foundation. 14:28

17 THE WITNESS: No. 14:28

18 BY MR. LOESER: 14:28

19 Q. Okay. We can go to the next slide. Oh, 14:28

20 actually, sorry, go back up to the... 14:28

21 Do you see on here that [REDACTED] 14:28

22 [REDACTED] " [REDACTED] "? 14:28

23 A. I see it written there, yes. 14:28

24 Q. Do you see [REDACTED] 14:28

25 " [REDACTED] "? 14:28

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1 A. Yes, I see that there. 14:28

2 Q. And do you see that those are -- those [REDACTED] 14:28

3 [REDACTED] 14:29

4 [REDACTED]. Is 14:29

5 that your understanding? 14:29

6 A. So -- yeah, so I don't know the context of 14:29

7 that, so I don't -- I don't know if it really is or 14:29

8 isn't. 14:29

9 Q. Okay. But you see that for "[REDACTED] 14:29

10 [REDACTED]," it says, "[REDACTED] 14:29

11 [REDACTED]," and it says, "[REDACTED]"? 14:29

12 A. Yes, I see that. 14:29

13 Q. And do you see under "[REDACTED]," 14:29

14 it says, "[REDACTED] 14:29

15 [REDACTED]" it says "[REDACTED]"? 14:29

16 A. Yes, I see that. 14:29

17 Q. Okay. Go to the next slide. 14:29

18 Now, Miss Chang, you were involved in 14:29

19 [REDACTED], 14:29

20 were you not? 14:29

21 A. Again, I -- I don't remember. 14:30

22 Q. Okay. If you look at the first bullet, it 14:30

23 says: 14:30

24 "[REDACTED] 14:30

25 [REDACTED] (note: [REDACTED] 14:30

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1 [REDACTED] ). " 14:30

2 Do you recall [REDACTED] 14:30

3 [REDACTED]? 14:30

4 A. Again, I don't remember this. 14:30

5 Q. Okay. And you look at the next one: 14:30

6 "[REDACTED] 14:30

7 [REDACTED] ([REDACTED] 14:30

8 [REDACTED] ). " 14:30

9 Do you recall what that refers to? 14:30

10 A. No. 14:30

11 Q. This next bullet item is: 14:30

12 "[REDACTED] 14:30

13 [REDACTED] - 14:30

14 e.g., [REDACTED] ([REDACTED], 14:30

15 [REDACTED] ). " 14:30

16 Do you have an understanding of what 14:30

17 "[REDACTED]" are? 14:30

18 A. I know what an [REDACTED] is, but I don't -- 14:30

19 I don't recognize in this context. 14:30

20 Q. Yeah. You don't recall in any way your 14:30

21 involvement in [REDACTED] 14:30

22 [REDACTED] 14:31

23 [REDACTED]? 14:31

24 A. I don't remember. 14:31

25 Q. Okay. And: 14:31

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1 " [REDACTED] 14:31

2 [REDACTED] 14:31

3 [REDACTED]. " 14:31

4 That must be something that you remember; 14:31

5 right? 14:31

6 A. I don't remember it. 14:31

7 Q. Okay. You don't recall the role you played 14:31

8 in [REDACTED] 14:31

9 [REDACTED] 14:31

10 [REDACTED]? 14:31

11 A. Correct. I don't remember. 14:31

12 Q. As you sit here today, can you recall the 14:31

13 [REDACTED] 14:31

14 [REDACTED]? 14:31

15 A. No, I can't. 14:31

16 Q. Do you think you ever knew what the 14:31

17 difference was? 14:31

18 A. I don't know. 14:31

19 MR. LOESER: We can go to the next exhibit. 14:31

20 (Exhibit 13 marked for identification.) 14:32

21 BY MR. LOESER: 14:32

22 Q. This will be Exhibit 13, which is an 14:32

23 email from Simon Cross to you and others, dated 14:32

24 December 10th, 2013, the subject "Re: Simon's 14:32

25 updates - 6th of December." 14:32

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1 Do you see this document, Miss Chang? 14:32

2 A. Now, I do. Can I have time to read through 14:32

3 it? 14:33

4 Q. Sure. 14:33

5 A. Okay. 14:33

6 Q. And if you flip through this email string, 14:33

7 you have probably noticed that this is a string that 14:33

8 has a series of updates called "Simon's updates." 14:33

9 Did you see that? 14:33

10 A. Yes. 14:33

11 Q. And do you recall that Simon Cross regularly 14:33

12 sent out updates that were dated? 14:33

13 A. I don't really remember the updates 14:34

14 specifically, but like it says in the email, it 14:34

15 looks like he sends it out regularly. 14:34

16 Q. Okay. And in the update, he runs through a 14:34

17 series of projects; is that right? 14:34

18 A. It looks that way, yes. 14:34

19 Q. Any reason to think that he was sending out 14:34

20 false information? 14:34

21 A. I'm not sure I know what that means. 14:34

22 Q. Well, you got these updates and you didn't 14:34

23 read them and go, wow, this is all untrue; right? 14:34

24 There is no email -- you wouldn't have an email back 14:34

25 to Simon saying, stop sending these updates, they 14:34

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1 are all untrue? 14:34

2 A. Well, that would be rude of me, but... 14:34

3 Q. You don't recall doing that? 14:34

4 A. No, but I don't -- I don't really remember 14:34

5 reading through these updates just because we all 14:34

6 had to write updates so I don't really spend time 14:34

7 reading other people's updates. 14:34

8 Q. What did you write updates about? 14:35

9 A. The projects I was working on. 14:35

10 Q. Okay. And so let's look at -- go to the 14:35

11 third page of the email string. There is a heading, 14:35

12 "[REDACTED]." 14:35

13 Do you see that? 14:35

14 A. On page 3? 14:35

15 Q. On page 3. Well, there is a heading 14:35

16 "[REDACTED]" on every single one of the 14:35

17 updates, but there is one for the one dated [REDACTED] 14:35

18 [REDACTED], as well. Do you see that? 14:35

19 A. Yes. 14:35

20 Q. And tell me, what was "[REDACTED]" 14:35

21 [REDACTED]"? 14:35

22 A. I don't remember. 14:35

23 Q. You remember absolutely nothing about a task 14:35

24 that you were involved in called "[REDACTED]" 14:35

25 [REDACTED]"? 14:35

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1 MR. FALCONER: Objection. 14:35

2 THE WITNESS: I don't remember. 14:35

3 BY MR. LOESER: 14:35

4 Q. Okay. Well, let's look at what it says you 14:35

5 were doing -- 14:36

6 SPECIAL MASTER GARRIE: Sorry. When we get 14:36

7 to a breaking point -- any idea when that may be? 14:36

8 MR. FALCONER: I was thinking after the 14:36

9 next -- after we are done with this document. 14:36

10 MR. LOESER: That's fine. 14:36

11 SPECIAL MASTER GARRIE: And then I would 14:36

12 like all the lawyers to be moved into another room. 14:36

13 Thank you. 14:36

14 BY MR. LOESER: 14:36

15 Q. Miss Chang, if you look at the [REDACTED] 14:36

16 [REDACTED], you will see the last bullet. 14:36

17 Can you read that last bullet, please? 14:36

18 A. "Jackie leading on [REDACTED] 14:36

19 [REDACTED] with Legal 14:36

20 and Product." 14:36

21 Q. And is that accurate? 14:36

22 A. Again, I don't remember. 14:36

23 Q. So as you sit here today, you have zero 14:36

24 recollection of your being tasked with [REDACTED] 14:36

25 [REDACTED] with Legal 14:36

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1 and Product? 14:36

2 A. I don't remember this specifically. 14:36

3 Q. Do you remember anything at all about it? 14:36

4 A. No, I don't. 14:36

5 Q. Okay. Let's move up the string to page 2 of 14:37

6 the string under the same heading, "[REDACTED]" 14:37

7 "[REDACTED]". 14:37

8 You will see that this update, if you go 14:37

9 farther up the string, is [REDACTED]. It 14:37

10 was sent by Simon Cross. The first recipient in the 14:37

11 "to" list is you. 14:37

12 Do you see that? 14:37

13 A. Sorry. What date? 14:37

14 Q. [REDACTED]. 14:37

15 A. Okay. 14:37

16 Q. First recipient, first person Simon put on 14:37

17 that "to" line was Jackie Chang; right? 14:37

18 A. Well, I don't know if I'm -- I'm the first 14:37

19 person that shows up there. 14:37

20 Q. All right. And let's go down to "[REDACTED]" 14:37

21 "[REDACTED]". So why don't you read the second 14:37

22 bullet. 14:37

23 A. "[REDACTED]" -- Jackie 14:37

24 working closely with Marie and Legal 14:37

25 to design [REDACTED] 14:37

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1 [REDACTED]. Spec for 14:38  
2 updates to tools in progress and 14:38  
3 moving towards build-stage. [REDACTED]t 14:38  
4 [REDACTED] 14:38  
5 [REDACTED]. " 14:38  
6 Q. So do you remember working closely with 14:38  
7 Marie in legal? 14:38  
8 A. I don't. 14:38  
9 Q. And who is Marie? 14:38  
10 A. I don't know which Marie it may be referring 14:38  
11 to. 14:38  
12 Q. Okay. And so, Miss Chang, you're telling 14:38  
13 the jury that even though this bullet indicates that 14:38  
14 you were "working closely with Marie in Legal to 14:38  
15 design [REDACTED]  
16 [REDACTED]," you have utterly no recollection of anything 14:38  
17 relating to that task? 14:38  
18 A. Correct. 14:38  
19 MR. LOESER: This is a fine time to take a 14:38  
20 break, as Special Master Garrie has requested. 14:38  
21 THE VIDEOGRAPHER: Okay. This marks the end 14:39  
22 of media No. 3 in the deposition of Jackie Chang. 14:39  
23 Going off the record. The time is 2:39. 14:39  
24 (Off the record.) 14:39  
25 THE VIDEOGRAPHER: This marks the beginning 15:04

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1 of media No. 4 in the deposition of Jackie Chang. 15:04

2 We are back on the record. The time is 3:04. 15:04

3 MR. LOESER: If we could mark as Exhibit 14 15:04

4 the next document, which for the record is an email 15:04

5 from Ime Archibong to Eddie O'Neil and Simon Cross, 15:04

6 dated [REDACTED], Subject line "Forward: 15:05

7 [REDACTED]. Importance: High." 15:05

8 (Exhibit 14 marked for identification.) 15:05

9 BY MR. LOESER: 15:05

10 Q. Miss Chang, do you see this email? 15:05

11 A. Yes. 15:05

12 Q. And do you see that the email forwards an 15:05

13 email from Ime Archibong to you and Simon Cross on 15:05

14 the same day, February 9th, 2014? 15:05

15 A. Yes. 15:05

16 Q. What does it mean when an email is marked as 15:05

17 "Importance High"? 15:05

18 MR. FALCONER: Objection. Foundation. 15:05

19 THE WITNESS: That it's of high importance. 15:05

20 BY MR. LOESER: 15:05

21 Q. Okay. And if we look down to the email in 15:05

22 the middle of the page, a little further, there's an 15:05

23 email from you, part of this string, to -- is it 15:05

24 Ime? Ime Archibong? Am I saying that right? 15:06

25 A. Ime. 15:06

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1 Q. Ime -- to Ime and Simon Cross, and that's 15:06  
2 the email that's forwarded above and then forwarded 15:06  
3 above that; is that right? 15:06  
4 A. Yes. Sorry, is it okay if I read the email? 15:06  
5 Q. Absolutely. Yeah. 15:06  
6 A. Okay. 15:07  
7 Q. Okay. Let's start at the very beginning of 15:07  
8 this string, if you go to the second page. At the 15:07  
9 very bottom of the string is an email from Ime to 15:07  
10 you and Simon Cross on [REDACTED], "Subject: 15:07  
11 Re: [REDACTED]." And she asks: 15:07  
12 "Can I have both of you join me for 15:08  
13 the second half of a Dan update 15:08  
14 tomorrow -- to talk a bit more about 15:08  
15 [REDACTED] and where we are from a product 15:08  
16 perspective (Simon) and a partnerships 15:08  
17 perspective (Jackie)." 15:08  
18 Do you see that? 15:08  
19 A. Yes. 15:08  
20 Q. Can you tell me what "[REDACTED]" refers to? 15:08  
21 A. I don't remember. 15:08  
22 Q. Okay. And so whatever it meant, you were 15:08  
23 being asked to provide your perspective on the 15:08  
24 partnership perspective; is that right? 15:08  
25 MR. FALCONER: Objection. Foundation. 15:08

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1 THE WITNESS: Yes. 15:08

2 BY MR. LOESER: 15:08

3 Q. Okay. 15:08

4 A. It looks like that. 15:08

5 Q. And so -- and above that is an email from 15:08

6 you at 2:19 p.m., where you say: 15:08

7 "Sure thing - can I call or VC as in 15:08

8 I'm working from LA?" 15:09

9 Do you see that? 15:09

10 A. Yes. 15:09

11 Q. Okay. And then moving up, Ime sends another 15:09

12 email about this at 2:28 and indicates what -- is it 15:09

13 a he or a she? 15:09

14 A. Sorry, who? 15:09

15 Q. Ime. It says -- well, whatever -- I think 15:09

16 it would be most helpful, Ime describes what -- what 15:09

17 in his or her view would be most helpful; right? 15:09

18 A. His. 15:09

19 Q. His, okay. 15:09

20 Is that right? 15:09

21 A. (Witness nods.) 15:09

22 Q. And the second bullet of what he thinks 15:09

23 would be helpful is directed to you; is that right? 15:09

24 A. Yes. 15:09

25 Q. And why don't you read that bullet? 15:09

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1           A.    "Jackie: One slide that summarizes           15:09  
2                   the Partnership's" work -- "[REDACTED]           15:09  
3                   [REDACTED]. Maybe a quick callout           15:09  
4                   of the coordination work across all           15:09  
5                   teams in his org, and then dive           15:10  
6                   specifically into the work that [REDACTED]           15:10  
7                   [REDACTED]."

8           Q.    And do you recall, looking at this, whether   15:10  
9                   the [REDACTED] that is being referred to is the [REDACTED]   15:10  
10                  [REDACTED]? Is that what "[REDACTED]" refers   15:10  
11                  to?   15:10

12           A.    So I -- I don't remember.                           15:10

13           Q.    So and then you prepare a slide, if you look   15:10  
14                  up the string, at 2:46 p.m. You say:           15:10

15                       "Does this work for Partnerships           15:10  
16                       update?"   15:10

17                       I assume that's in response to your           15:10  
18                  request -- the request for you to provide one slide   15:10  
19                  that summarizes the partnership teamwork?   15:10

20           A.    Yes.   15:10

21           Q.    Okay.   15:10

22           A.    Yeah.   15:10

23           Q.    All right. And then Ime makes some comments   15:10  
24                  on some format and language suggestions, and states:   15:10

25                       "The area where I've added a couple           15:11

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1 of works in, is [REDACTED] 15:11  
2 section. This will be the area that 15:11  
3 Dan will want to discuss the most. 15:11  
4 Remember that he's of the mindset 15:11  
5 that [REDACTED] 15:11  
6 [REDACTED], so we'll have to 15:11  
7 explain to him [REDACTED] 15:11  
8 [REDACTED]. " 15:11  
9 Do you see that? 15:11  
10 A. Yes. 15:11  
11 Q. Okay. And then you respond at 4:18 -- so 15:11  
12 that email was sent at 3:54, and a little bit after 15:11  
13 that, you respond. 15:11  
14 Can you read your response in the email 15:11  
15 that's next up in the string. 15:11  
16 A. "Actually - here's an updated version. 15:11  
17 I'll explain on the call, but in 15:11  
18 essence, [REDACTED] 15:11  
19 [REDACTED] 15:11  
20 [REDACTED], 15:11  
21 [REDACTED] 15:11  
22 [REDACTED] 15:11  
23 [REDACTED] 15:11  
24 ([REDACTED]). 15:11  
25 I believe we should [REDACTED] 15:11

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1 [REDACTED] 15:12

2 [REDACTED] however, it's worthwhile 15:12

3 acknowledging this as there's been 15:12

4 some confusion by partnership teams 15:12

5 on [REDACTED] 15:12

6 [REDACTED]. " 15:12

7 Q. Okay. So this email that you wrote shows 15:12

8 that you were involved in this discussion of [REDACTED] 15:12

9 [REDACTED] for 15:12

10 [REDACTED]; is that right? 15:12

11 A. It looks like it, yes. 15:12

12 Q. Okay. And you [REDACTED] 15:12

13 [REDACTED]. And before we looked at 15:12

14 the slide, you couldn't recall what those terms 15:12

15 mean. 15:12

16 Does this refresh your recollection of what 15:12

17 you viewed as [REDACTED] 15:12

18 [REDACTED]? 15:12

19 A. No. 15:12

20 Q. Okay. So even though it is a paragraph that 15:12

21 describes [REDACTED] 15:12

22 [REDACTED], it doesn't refresh your recollection at 15:12

23 all as to what those terms mean to you? 15:12

24 A. I think it would mean -- [REDACTED] meaning 15:12

25 [REDACTED] and [REDACTED] mean [REDACTED]. 15:13

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1 Q. Okay. 15:13

2 A. To -- [REDACTED] ... 15:13

3 Q. All right. Well, specifically, what you 15:13

4 said is, "[REDACTED], 15:13

5 [REDACTED] 15:13

6 [REDACTED]. " 15:13

7 And so it appears that what you are saying 15:13

8 is that [REDACTED] by 15:13

9 [REDACTED], 15:13

10 [REDACTED] 15:13

11 [REDACTED]. 15:13

12 Is that a fair reading? 15:13

13 MR. FALCONER: Objection to the form. 15:13

14 BY MR. LOESER: 15:13

15 Q. Does that appear to be what you wrote? 15:13

16 MR. FALCONER: Same objection. 15:13

17 THE WITNESS: Can I read it one more time? 15:13

18 Sorry. 15:13

19 So, again, I don't remember in detail, but 15:14

20 it sounds like I could be referring to a couple 15:14

21 different things, so I'm not sure if it's specific 15:14

22 to friend data. 15:14

23 BY MR. LOESER: 15:14

24 Q. Okay. Well, let's look very carefully at 15:14

25 what you wrote. You say: 15:14

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1 " [REDACTED] [REDACTED] 15:14

2 [REDACTED] 15:14

3 [REDACTED]. " 15:14

4 Do you see that? 15:14

5 A. Yes. 15:14

6 Q. And so there are [REDACTED] 15:14

7 [REDACTED] of 15:14

8 [REDACTED]; is that right? 15:14

9 A. So, again, I don't know what the outcome 15:14

10 was, but I see what I wrote. 15:14

11 Q. Okay. And what are "[REDACTED]"? 15:14

12 A. To my understanding, it's [REDACTED] 15:15

13 [REDACTED]. 15:15

14 Q. Okay. And so this is referring to [REDACTED] 15:15

15 [REDACTED]; is that 15:15

16 right? 15:15

17 A. I think that's what it says, yeah. 15:15

18 Q. Okay. And when this says "[REDACTED] 15:15

19 [REDACTED]," you say, "I believe we should [REDACTED] 15:15

20 [REDACTED]," and that 15:15

21 means that for -- [REDACTED]. [REDACTED], 15:15

22 [REDACTED]. And "[REDACTED]" refers to [REDACTED] 15:15

23 [REDACTED]; is that 15:15

24 right? 15:15

25 A. Sorry. Can you state your question again? 15:15

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1 Q. Sure. I'm just trying to understand the 15:15  
2 terminology that you're using when you're making 15:15  
3 your recommendation about [REDACTED], 15:15  
4 and what you are saying is that, as you indicate 15:16  
5 here, you believed "we should [REDACTED] 15:16  
6 [REDACTED]."

7 And by "[REDACTED]," that refers to [REDACTED] 15:16  
8 [REDACTED]; is that right? 15:16

9 A. I think so, but I don't know. Like I don't 15:16  
10 remember in specificity. 15:16

11 Q. Okay. But that appears to be what the email 15:16  
12 that you wrote on [REDACTED] indicates; 15:16  
13 right? 15:16

14 A. It could be, yes. 15:16

15 Q. Well, it's more than it could be. It is 15:16  
16 what you wrote; right? 15:16

17 A. Well, I know what I wrote, but I don't know 15:16  
18 the inference behind that. 15:16

19 Q. So when you say but, in essence, "we are [REDACTED] 15:16  
20 [REDACTED] 15:16  
21 [REDACTED]," what do you 15:16  
22 mean by "[REDACTED] 15:16  
23 [REDACTED]"? 15:16

24 A. So "[REDACTED]" means [REDACTED] 15:16  
25 [REDACTED]. "[REDACTED]," I don't 15:16

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1 remember specifically what that -- what that could 15:17  
2 be. 15:17  
3 Q. Okay. And whatever it means, [REDACTED] 15:17  
4 [REDACTED] 15:17  
5 [REDACTED] 15:17  
6 [REDACTED] 15:17  
7 [REDACTED]? 15:17  
8 A. It sounds that way, yes. 15:17  
9 Q. Okay. And if you look up to the next email 15:17  
10 in the string, Ime Archibong says: 15:17  
11 "Thanks. That makes it more clear. 15:17  
12 I've cleaned up the chart to reflect 15:17  
13 that." 15:17  
14 Do you see that? 15:17  
15 A. Yes. 15:17  
16 Q. So Ime didn't have any problem understanding 15:17  
17 what you meant in that email we just went through; 15:17  
18 right? 15:17  
19 A. It looks like that, yes. 15:17  
20 MR. FALCONER: Lacks foundation. 15:17  
21 BY MR. LOESER: 15:17  
22 Q. I'm sorry. I didn't hear your answer. 15:17  
23 A. It looks like that. 15:17  
24 Q. Okay. Now, the email refers -- to your 15:17  
25 email on [REDACTED], 4:18 p.m., states: 15:18

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1 "Actually - here's an updated version." 15:18

2 So it appears to attach a document; is that 15:18

3 right? 15:18

4 A. I don't see an attachment, but I'm guessing, 15:18

5 yes, if it's referring to it. 15:18

6 MR. LOESER: Okay. And I will represent to 15:19

7 you that the next document is the attachment to that 15:19

8 email. And I don't -- I don't see a reference to 15:19

9 attachment either, so I'm not sure how that works. 15:19

10 But I think in the manner it was produced, this was 15:19

11 attached to that email. 15:19

12 And we'll confirm that for the record later, 15:19

13 Russ, just to make sure that we are right about 15:19

14 that, but that's my understanding. 15:19

15 So if we could look at Exhibit 15. 15:19

16 (Exhibit 15 marked for identification.) 15:19

17 BY MR. LOESER: 15:19

18 Q. And before we get to that, do you recall [REDACTED] 15:19

19 [REDACTED] 15:19

20 [REDACTED]? 15:19

21 A. I don't recall if they're the same or not. 15:19

22 Q. Okay. Let's look at this attachment, which 15:20

23 has the heading, "[REDACTED]" 15:20

24 [REDACTED]? " 15:20

25 Do you see this slide? 15:20

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1 A. Yes. 15:20

2 Q. Okay. If you could please read the third 15:20

3 bullet. 15:20

4 A. "[REDACTED]. 15:20

5 [REDACTED] - 15:20

6 [REDACTED] 15:20

7 [REDACTED] 15:20

8 [REDACTED] 15:20

9 [REDACTED]. We're building [REDACTED] 15:20

10 [REDACTED] 15:20

11 [REDACTED] 15:20

12 [REDACTED]. " 15:20

13 Q. Okay. And do you recall the -- that as part 15:20

14 [REDACTED] [REDACTED], there was going to be [REDACTED] 15:20

15 [REDACTED]? 15:20

16 A. So I don't remember. 15:21

17 Q. Okay. And if you look at -- can you read 15:21

18 the next bullet. 15:21

19 A. "[REDACTED] 15:21

20 [REDACTED] being [REDACTED]. 15:21

21 [REDACTED]. " 15:21

22 Q. Okay. Do you know what that means and do 15:21

23 you recall that happening? 15:21

24 A. I know what I think [REDACTED] 15:21

25 [REDACTED] means that [REDACTED], but I 15:21

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1 don't remember what happened afterwards. 15:21

2 Q. And according to the email, you worked on 15:21

3 this slide. And, in fact, if you look back, what 15:21

4 the email said was -- you were asked specifically to 15:21

5 create the slide for -- one slide that summarizes 15:21

6 the partnership's team work on [REDACTED]. 15:21

7 Do you have any recollection of creating 15:22

8 anything having to do with this slide deck? 15:22

9 A. I don't even know what page it would be. 15:22

10 I've been asked to create many slide decks, and I 15:22

11 was working on a lot of projects, so I don't 15:22

12 remember this specifically. 15:22

13 Q. Let's go to the third page of the deck. 15:22

14 A. Yeah. 15:22

15 Q. Do you see the heading, "[REDACTED]" 15:22

16 "[REDACTED]"? 15:22

17 A. Yep. Yes. 15:22

18 Q. Do you recall creating this slide? 15:22

19 A. I don't remember. 15:22

20 Q. Nonetheless, it looks like the partnership 15:22

21 update that you were asked to prepare; is that 15:22

22 right? 15:22

23 A. I would assume so. 15:22

24 Q. Now, if -- the first bullet says, "[REDACTED]" 15:22

25 "[REDACTED]"; is that 15:22

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1 right? 15:22

2 A. Yes. 15:22

3 Q. And it says: 15:22

4 " [REDACTED] 15:22

5 [REDACTED]. " 15:23

6 Do you see that? 15:23

7 A. Yes. 15:23

8 Q. And do you recall getting information from 15:23

9 products about [REDACTED] 15:23

10 [REDACTED]? 15:23

11 A. I don't remember specifically. 15:23

12 Q. Okay. Let's look at that second bullet, 15:23

13 which has to do with that topic that you wrote so 15:23

14 clearly about to Ime, "[REDACTED]." That bullet 15:23

15 says, "[REDACTED]." 15:23

16 Do you see that? 15:23

17 A. Sorry, say that again. 15:23

18 Q. You see the bullet "[REDACTED] 15:23

19 [REDACTED]"? 15:23

20 A. Oh, yes. 15:23

21 Q. Can you read the material that's under that 15:23

22 bullet. 15:23

23 A. "[REDACTED] 15:23

24 [REDACTED]: 15:23

25 "1. [REDACTED]. 15:23

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1 " [REDACTED] 15:23  
2 [REDACTED] 15:23  
3 [REDACTED]. 15:23  
4 " [REDACTED] 15:24  
5 [REDACTED] 15:24  
6 [REDACTED] 15:24  
7 "2. [REDACTED]. 15:24  
8 " [REDACTED] 15:24  
9 [REDACTED]. " 15:24  
10 Q. And do you recall coming up with [REDACTED] 15:24  
11 [REDACTED] 15:24  
12 [REDACTED]? 15:24  
13 A. So, again, I don't remember this in 15:24  
14 specificity. I think this was like one of many 15:24  
15 projects I was working on, and I think most of it 15:24  
16 was aggregating information. 15:24  
17 Q. Okay. But this -- that particular bullet 15:24  
18 reflects what you indicated in the email you wrote 15:24  
19 to Ime on [REDACTED], generally; right? 15:24  
20 It's consistent with what you wrote to him about 15:24  
21 [REDACTED] 15:24  
22 [REDACTED]? 15:24  
23 A. Yes. If it was in the email, then yes. 15:24  
24 MR. LOESER: Okay. Let's go to the next 15:25  
25 exhibit is a video clip that I want to play to you. 15:25

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1 And it's not very long. And then we'll have a 15:25  
2 transcript of it as well to the extent that it is 15:25  
3 not clear. 15:25

4 DEPOSITION REPORTER: Excuse me, Counsel, 15:25  
5 are you going to want this reported? 15:25

6 MR. LOESER: I think you'll be able to. 15:25  
7 It's not -- it's Mark Zuckerberg speaking and he's 15:25  
8 not speaking terribly quickly, but we have a 15:25  
9 transcript so -- you know what, I wouldn't bother 15:25  
10 reporting it. We will just have the transcript 15:25  
11 admitted after we play the recording. 15:25

12 DEPOSITION REPORTER: Thank you. 15:25

13 MR. LOESER: Actually, hang on one second 15:25  
14 before we do that. If we can go back to the last 15:26  
15 exhibit. 15:26

16 BY MR. LOESER: 15:26

17 Q. So I want to make sure I understand what 15:26  
18 this slide indicates for [REDACTED] 15:26  
19 [REDACTED]. 15:26

20 So under the first number, No. 1, 15:26  
21 "[REDACTED]," so this describes the situations in 15:26  
22 which [REDACTED] 15:26  
23 [REDACTED]. 15:26

24 So it says, "[REDACTED]": 15:26

25 "[REDACTED]" 15:26

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1 [REDACTED] : " 15:26

2 Number 1 is "[REDACTED]." 15:27

3 So the first [REDACTED] 15:27

4 [REDACTED] 15:27

5 "[REDACTED] 15:27

6 [REDACTED]." 15:27

7 Do you see that? 15:27

8 A. Yes. 15:27

9 Q. And then the second [REDACTED] 15:27

10 [REDACTED] 15:27

11 [REDACTED] "[REDACTED] 15:27

12 [REDACTED]." 15:27

13 Do you see that? 15:27

14 A. Yes. 15:27

15 Q. And then the third [REDACTED] 15:27

16 [REDACTED] 15:27

17 [REDACTED] "[REDACTED]." And that indicates 15:27

18 "[REDACTED]." 15:27

19 Is that right? 15:27

20 A. It looks like that, yes. 15:27

21 Q. And so based on the work that you did in 15:27

22 this project of [REDACTED] 15:27

23 [REDACTED] 15:27

24 [REDACTED], you certainly knew that [REDACTED] 15:28

25 [REDACTED] 15:28

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1 [REDACTED]; right? 15:28

2 A. I mean, I don't really remember in detail, 15:28

3 but if it's what it says, yes. 15:28

4 Q. Yeah, that's what these various email that 15:28

5 you were involved -- the projects that you were 15:28

6 involved in, that's what -- that's what that showed; 15:28

7 right? It showed that [REDACTED] 15:28

8 [REDACTED] 15:28

9 [REDACTED] 15:28

10 [REDACTED]; right? 15:28

11 A. Well, I don't know specifically, because it 15:28

12 sounds like [REDACTED], and I just 15:28

13 don't want to assume like -- like blanket assume 15:28

14 across the board. 15:28

15 Q. But you --

16 A. Because I don't -- I don't know in detail. 15:28

17 Q. Yeah. But you can state clearly and 15:28

18 affirmatively that [REDACTED] 15:28

19 [REDACTED] 15:28

20 [REDACTED] 15:28

21 [REDACTED]; right? 15:29

22 MR. FALCONER: Objection. Form. 15:29

23 THE WITNESS: So, again, I don't know what 15:29

24 the timing of everything was, so I don't know like 15:29

25 when things intersected. 15:29

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1 BY MR. LOESER: 15:29

2 Q. Miss Chang, you know from the work that you 15:29

3 did that [REDACTED] 15:29

4 [REDACTED] 15:29

5 [REDACTED]; right? 15:29

6 A. It looks like that in the email, yes. 15:29

7 MR. LOESER: Okay. We can go to the next 15:29

8 exhibit. 15:29

9 (Exhibit 16 and Exhibit 17 marked for 15:29

10 identification.) 15:29

11 BY MR. LOESER: 15:29

12 Q. Now, having gone through all these emails 15:29

13 now, do you remember the connection between the 15:29

14 introduction of the new platform and the transition 15:30

15 from Graph API version 1 to version 2? 15:30

16 A. I don't remember in specificity like what 15:30

17 date and things around that. This was a lot of 15:30

18 stuff going on that's all blurred together, so not 15:30

19 with like full certainty. 15:30

20 Q. And do you remember, as a general matter, 15:30

21 that when the new platform came on and there was a 15:30

22 transition from the older Graph to the new Graph, 15:30

23 that two of the things specifically that happened 15:30

24 was that friends permissions were publicly 15:30

25 deprecated; right? 15:30

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1 MR. FALCONER: Objection. Form. 15:30

2 BY MR. LOESER: 15:30

3 Q. I'm sorry. Let me ask again. 15:30

4 Putting aside the terminology and what Graph 15:30

5 version it was and what platform it was, there was a 15:30

6 new platform that was introduced. And in that 15:30

7 new -- that new platform, Facebook publicly 15:30

8 announced that it was -- that it was deprecating 15:30

9 friend permissions; right? 15:30

10 MR. FALCONER: Objection. Form. 15:30

11 THE WITNESS: I think so. I don't -- I 15:31

12 don't remember specifically like which announcement. 15:31

13 Sorry, there's a lot of F8s, so I think this is what 15:31

14 the picture is, so I don't remember. 15:31

15 MR. LOESER: Yeah. Let's go ahead and play 15:31

16 this. Maybe it will jog your memory. 15:31

17 (Video played.) 15:31

18 MR. LOESER: Let's try this again because 15:31

19 there is an echo. 15:31

20 (Video played.) 15:31

21 BY MR. LOESER: 15:32

22 Q. We'll go through the transcript itself 15:32

23 because there was some echo there. 15:32

24 But you know what an "F8 Conference" is? 15:32

25 A. Yes. 15:32

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1 Q. And what we just showed you was from the 15:32  
2 April 30th, 2014 F8 Conference. And do you recall, 15:32  
3 did you attend that conference? 15:33

4 MR. FALCONER: Objection. Form. 15:33

5 THE WITNESS: I -- actually, I don't 15:33  
6 remember. I've been to many, but I don't know the 15:33  
7 exact dates of which ones I've gone to, and I've 15:33  
8 also missed some, as well, so I don't know which 15:33  
9 one. 15:33

10 BY MR. LOESER: 15:33

11 Q. Okay. And I'm going to read for you what 15:33  
12 Mr. Zuckerberg just said, and you can tell me if 15:33  
13 this refreshes your recollection of whether you were 15:33  
14 in attendance at this conference. 15:33

15 What Mr. Zuckerberg said was: 15:33

16 "We've also heard that sometimes you 15:33  
17 can be surprised when one of your 15:33  
18 friends shares some of your data with 15:33  
19 an app. So now we're going to change 15:33  
20 this and we're going to make it so 15:33  
21 that now everyone has to choose to  
22 share their own data with an app 15:33  
23 themselves. We think this is really" 15:33  
24 important -- "a really important step 15:33  
25 for giving people power and control 15:33

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1 over how they share their data in 15:33  
2 apps." 15:33  
3 Do you recall Mr. Zuckerberg saying that? 15:33  
4 A. Again, I don't remember. A lot of these all 15:33  
5 blurred together, so I don't remember that specific 15:34  
6 one. 15:34  
7 Q. Now, as we just went through looking at your 15:34  
8 email, you were very involved in figuring out [REDACTED] 15:34  
9 [REDACTED] 15:34  
10 [REDACTED]; right? That's what those emails 15:34  
11 showed. 15:34  
12 A. Not [REDACTED]. I think to [REDACTED] 15:34  
13 [REDACTED]. 15:34  
14 Q. But including [REDACTED]; 15:34  
15 right? 15:34  
16 A. Yes, that seems to be one of them. 15:34  
17 Q. Okay. And so when Mr. Zuckerberg is talking 15:34  
18 about how friends permissions were going away, at 15:34  
19 the time he was saying that in April 30th, 2018 15:34  
20 [verbatim], that was shortly after the email that we 15:34  
21 went through in which you were talking about [REDACTED] 15:34  
22 [REDACTED] 15:34  
23 [REDACTED]. Isn't that right? 15:34  
24 A. I -- if that's what it shows. I don't 15:34  
25 recall specifically. 15:35

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1 Q. Let's go back to your February 9th, 2014 15:35  
2 email, which is Exhibit 14. And, again, what you 15:35  
3 wrote was: 15:35  
4 "I'll explain on the call but, in 15:35  
5 essence [REDACTED] 15:35  
6 [REDACTED] based on 15:35  
7 [REDACTED]. 15:35  
8 Where I've labeled [REDACTED]  
9 [REDACTED] 15:35  
10 [REDACTED]. I believe 15:35  
11 we should [REDACTED] 15:35  
12 [REDACTED]."  
13 Right? So that pretty clearly indicates 15:35  
14 that [REDACTED] 15:35  
15 [REDACTED] 15:35  
16 [REDACTED] 15:35  
17 [REDACTED]; right? 15:35  
18 A. I'm sorry. What was the date of the video? 15:35  
19 Q. The video was April 30th, 2014. 15:35  
20 A. So this is before or... 15:36  
21 Q. Yes. Your email was before that video. 15:36  
22 Your email is [REDACTED] 15:36  
23 [REDACTED]; right? 15:36  
24 A. I guess. Sorry, [REDACTED]? I... 15:36  
25 Q. [REDACTED] -- you know full well from 15:36

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1 the work you did that [REDACTED] 15:36  
2 [REDACTED]; 15:36  
3 right? 15:36  
4 A. Again, I don't know when you say "[REDACTED]," 15:36  
5 like -- like what specific dates, but this seems to 15:36  
6 be said before the video. 15:36  
7 Q. Okay. So before the video, you were 15:37  
8 involved in a project to figure out [REDACTED] 15:37  
9 [REDACTED] 15:37  
10 [REDACTED]; right? 15:37  
11 A. Yes -- or not specific [REDACTED], but like 15:37  
12 [REDACTED], it looks like. 15:37  
13 Q. [REDACTED]; right? 15:37  
14 A. Yes. 15:37  
15 Q. Okay. And, then, on April 30th, 15:37  
16 Mr. Zuckerberg publicly announced that friends 15:37  
17 permissions were going away; right? 15:37  
18 A. Per that video, yes. 15:37  
19 Q. And, in fact, he said, "We're going to make 15:37  
20 it so that now everyone has to choose to share their 15:37  
21 own data with an app themselves"; right? 15:37  
22 A. Yes. 15:37  
23 Q. And so that would mean that no app would get 15:37  
24 access to data about anyone other than the Facebook 15:37  
25 user using the app. Isn't that what he described? 15:37

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1 A. Yes. 15:37

2 Q. Now, Mr. Chang, you knew at the time -- 15:37

3 A. Sorry, Mrs. 15:37

4 Q. Miss Chang. I'm sorry. 15:37

5 A. Yeah. 15:38

6 Q. You knew at the time that it was not true 15:38

7 that after -- that [REDACTED] 15:38

8 [REDACTED]; right? 15:38

9 A. Sorry, can you say it again? 15:38

10 Q. You knew at the time of the F8 presentation 15:38

11 in April of 2014 that [REDACTED] 15:38

12 [REDACTED] 15:38

13 [REDACTED]; right? 15:38

14 A. It sounds like [REDACTED] 15:38

15 [REDACTED], yes. 15:38

16 Q. Okay. And you knew at the time of 15:38

17 Mr. Zuckerberg's April 2014 presentation that [REDACTED] 15:38

18 [REDACTED] 15:38

19 [REDACTED]; right? 15:38

20 A. Well, again, I don't remember the dates, but 15:38

21 per whatever the email says. 15:39

22 Q. So that's a yes? 15:39

23 MR. FALCONER: Objection. Foundation and 15:39

24 form. 15:39

25 / / / 15:39

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1 BY MR. LOESER: 15:39

2 Q. I'll ask again. You knew at the time of 15:39

3 Mr. Zuckerberg's April 2014 keynote address that 15:39

4 [REDACTED] 15:39

5 [REDACTED]; right? 15:39

6 A. I don't know if I knew at that moment 15:39

7 specific to what he was saying. I don't even know 15:39

8 if I was there so... 15:39

9 Q. Right. But you knew, based on the work that 15:39

10 you did and [REDACTED] that you discussed with 15:39

11 your colleagues, that [REDACTED] 15:39

12 [REDACTED] 15:39

13 [REDACTED]; right? 15:39

14 A. Yes. That's what it looks like. 15:39

15 Q. Okay. And at the time of Mr. Zuckerberg's 15:39

16 presentation in April 2014, you also knew that [REDACTED] 15:39

17 [REDACTED] 15:40

18 [REDACTED] 15:40

19 [REDACTED]; right? 15:40

20 A. I don't know. I can't really speculate at 15:40

21 that moment in time in terms of how you're trying to 15:40

22 connect the two. 15:40

23 Q. Well, prior to April, in the February and 15:40

24 the timeframe in the emails that we went through, 15:40

25 you discussed [REDACTED] 15:40

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1 [REDACTED]. Isn't that 15:40  
2 right? 15:40  
3 A. Yes, [REDACTED]. But I think you're 15:40  
4 connecting it to something else, and I don't know 15:40  
5 that. 15:40  
6 Q. Okay. And [REDACTED] 15:40  
7 [REDACTED] 15:40  
8 "[REDACTED]"; right? 15:40  
9 A. That's what it looks like in terms of a 15:40  
10 proposal. 15:40  
11 Q. Now, Mr. Zuckerberg said: 15:40  
12 "We're going to make it so that now 15:41  
13 everyone has to choose to share their 15:41  
14 own data with an app themselves." 15:41  
15 Is that right? 15:41  
16 A. Correct. 15:41  
17 Q. And yet, [REDACTED] 15:41  
18 [REDACTED] 15:41  
19 [REDACTED]; right? 15:41  
20 A. I -- I don't think so, because I think what 15:41  
21 you're saying is that [REDACTED]. And a 15:41  
22 [REDACTED], from my understanding, is [REDACTED] 15:41  
23 [REDACTED]. So the 15:41  
24 [REDACTED]. 15:41  
25 Q. So when [REDACTED] 15:41

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1 [REDACTED], right, that 15:41

2 [REDACTED] 15:41

3 [REDACTED]; is that right? 15:41

4 A. My understanding -- 15:41

5 MR. FALCONER: Objection. Objection. Form. 15:42

6 THE WITNESS: My understanding is that it's 15:42

7 the ability to ask a user for that. 15:42

8 BY MR. LOESER: 15:42

9 Q. And -- now, you didn't hear Mr. Zuckerberg 15:42

10 say at that keynote address that there was a 15:42

11 population of partners that would continue to have 15:42

12 access to friends data, did you? 15:42

13 A. No, I didn't hear that. 15:42

14 Q. And, Miss Chang, do you recall that you -- 15:42

15 that you attended that conference and you were 15:42

16 involved in -- you had a presentation yourself 15:42

17 there? 15:42

18 A. I don't know if it was that year. I have 15:42

19 been involved at F8. I have been a couple years. I 15:42

20 don't know if it was that specific one. 15:42

21 So, yes, it could be possible. I just -- I 15:43

22 don't remember that specific one. 15:43

23 MR. LOESER: Okay. We can go to the next 15:43

24 exhibit. It's Exhibit 18. 15:43

25 (Exhibit 18 marked for identification.) 15:43

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1 BY MR. LOESER: 15:43

2 Q. Miss Chang, you are looking at an email from 15:43

3 yourself to Deborah Liu, among others, dated March 15:44

4 23rd, 2014. The subject, "Re: [REDACTED] [REDACTED] 15:44

5 [REDACTED]." 15:44

6 Do you see that? 15:44

7 A. Yes. 15:44

8 Q. And this email string concerns a discussion 15:44

9 about [REDACTED] is that 15:44

10 right? 15:44

11 A. Yes. 15:44

12 Q. And what is a "[REDACTED]"? 15:44

13 A. Well, it says "[REDACTED] 15:44

14 [REDACTED]." 15:44

15 Q. Okay. Can you tell me what a "[REDACTED] 15:44

16 [REDACTED]" is? 15:44

17 A. It's [REDACTED]. 15:44

18 Q. And does it [REDACTED] 15:45

19 [REDACTED]? 15:45

20 A. I think that depends [REDACTED]. 15:45

21 Q. Is that one of the things that [REDACTED] 15:45

22 [REDACTED]? 15:45

23 A. Again, I don't -- I can't speak for [REDACTED] 15:45

24 [REDACTED]. I don't know about [REDACTED]. 15:45

25 Q. Well, let's talk about [REDACTED] 15:45

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1 [REDACTED] . 15:45

2 A. [REDACTED] , yes. 15:45

3 Q. You were obviously involved in the 15:45

4 discussions about [REDACTED] 15:45

5 [REDACTED] ; is that 15:45

6 right? 15:45

7 A. Yes. 15:45

8 Q. Why don't we go back into the string, and 15:45

9 look at the third page. 15:46

10 A. Is it okay if I read through? 15:46

11 Q. Yeah, please. 15:46

12 A. Thank you. 15:46

13 Q. I just have a couple questions, so if you 15:46

14 want to skim it, you can probably save yourself some 15:46

15 time. 15:46

16 A. Okay. Yes. Okay. 15:46

17 Q. So this is a discussion about the 15:46

18 [REDACTED] -- well, let's go to page 3 and 15:47

19 just look at -- there's an email from -- it starts 15:47

20 at the bottom of page 2, Rob Daniel to Mike Vernal, 15:47

21 dated March 22nd, 2014. 15:47

22 Do you recall who Rob Daniel is? 15:47

23 A. Yes, he was in business development. 15:47

24 Q. Okay. Was he -- it appears he was 15:47

25 [REDACTED] ; is that right? 15:47

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1           A.     [REDACTED], yes. Well, I don't know for 15:47  
2     [REDACTED], but from what it's 15:47  
3     referencing here, [REDACTED]. 15:47  
4           Q.     Okay. And who was Mike Vernal? 15:47  
5           A.     He was the engineering director for the 15:47  
6     platform. 15:47  
7           Q.     Okay. So if you look at the top of page 3 15:47  
8     it states: 15:48  
9                 "Hi Mike, [REDACTED] 15:48  
10                [REDACTED] 15:48  
11                [REDACTED]. Far below are the detailed 15:48  
12                [REDACTED]." 15:48  
13                Can you tell me what is meant by a "[REDACTED] 15:48  
14     [REDACTED]" [REDACTED]? 15:48  
15           A.     So like I mentioned earlier, it's, you know, 15:48  
16     [REDACTED] 15:48  
17     [REDACTED], 15:48  
18     [REDACTED] 15:48  
19     [REDACTED]. 15:48  
20           Q.     Okay. [REDACTED] -- one way of 15:48  
21     [REDACTED] 15:48  
22     [REDACTED], [REDACTED] 15:48  
23     [REDACTED]; right? 15:48  
24           A.     I wouldn't classify it that. So I would say 15:48  
25     it's -- [REDACTED], [REDACTED] 15:48

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1 [REDACTED]. So like the example 15:49  
2 [REDACTED], [REDACTED] 15:49  
3 [REDACTED], and then they can 15:49  
4 [REDACTED], it's in that sense. 15:49  
5 But it's -- I wouldn't classify it as 15:49  
6 [REDACTED]. It's [REDACTED], and 15:49  
7 then the [REDACTED] 15:49  
8 [REDACTED]. 15:49  
9 Q. Okay. So you wouldn't [REDACTED] 15:49  
10 [REDACTED]? 15:49  
11 A. No. 15:49  
12 Q. Okay. 15:49  
13 A. That would be an oversimplification. 15:49  
14 Q. Okay. Well, let's look at the email from -- 15:49  
15 to Mike from Bob Daniel. It says again: 15:49  
16 "[REDACTED] 15:49  
17 [REDACTED]. 15:49  
18 Far below are the [REDACTED] 15:49  
19 [REDACTED]. Immediately 15:49  
20 below is a quick summary. 15:49  
21 "[REDACTED] [REDACTED]." 15:49  
22 Do you see the second bullet? 15:49  
23 A. "[REDACTED] 15:49  
24 [REDACTED] 15:50  
25 [REDACTED]." 15:50

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1 Q. Okay. So that's how the -- [REDACTED] 15:50  
2 is characterized by Mike to -- or to Mike by Rob 15:50  
3 Daniel as [REDACTED]; right? 15:50  
4 MR. FALCONER: Objection. Form. 15:50  
5 THE WITNESS: [REDACTED] 15:50  
6 [REDACTED]. 15:50  
7 BY MR. LOESER: 15:50  
8 Q. What do you mean by "[REDACTED]"? 15:50  
9 A. [REDACTED]. 15:50  
10 Q. Okay. And then you read down, you said: 15:50  
11 "[REDACTED]" 15:50  
12 [REDACTED] 15:50  
13 [REDACTED]. 15:50  
14 Do you know what that means? 15:50  
15 A. I don't remember specifically. 15:50  
16 Q. Okay. And if you keep reading, it goes into 15:50  
17 some detail on [REDACTED] 15:50  
18 [REDACTED]. And it states: 15:50  
19 "[REDACTED]" 15:51  
20 [REDACTED] 15:51  
21 [REDACTED] 15:51  
22 [REDACTED] (e.g., 15:51  
23 [REDACTED] 15:51  
24 [REDACTED]). 15:51  
25 So what does it mean to say "[REDACTED]" 15:51

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1 [REDACTED] on 15:51  
2 [REDACTED] "? 15:51  
3 A. So -- 15:51  
4 MR. FALCONER: Objection. Foundation. 15:51  
5 Go ahead. 15:51  
6 THE WITNESS: So I believe it's what [REDACTED] 15:51  
7 [REDACTED]. 15:51  
8 BY MR. LOESER: 15:51  
9 Q. Okay. So it's [REDACTED] 15:51  
10 [REDACTED]; right? 15:51  
11 A. I wouldn't classify it that way. I would 15:51  
12 say it's [REDACTED] 15:51  
13 [REDACTED] 15:51  
14 [REDACTED]. 15:52  
15 Q. Okay. Why don't you explain what you mean 15:52  
16 by that. 15:52  
17 A. I think how you're describing it sounds more 15:52  
18 [REDACTED] -- I think the intent here is 15:52  
19 saying that [REDACTED] 15:52  
20 [REDACTED] 15:52  
21 [REDACTED] 15:52  
22 [REDACTED]. 15:52  
23 Q. Okay. That's how you interpret the phrase 15:52  
24 "[REDACTED] 15:52  
25 [REDACTED] "? 15:52

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1 A. Yes. 15:52

2 Q. And what is "OG data"? 15:52

3 A. Open Graph. 15:52

4 Q. And so how would [REDACTED] 15:52

5 [REDACTED]? 15:52

6 How does that work? 15:52

7 A. Yeah. So it would -- [REDACTED] 15:52

8 [REDACTED] -- 15:53

9 so, again, I'm not technical, so I think like from 15:53

10 my understanding of it, [REDACTED], you 15:53

11 can [REDACTED], so like [REDACTED]. 15:53

12 So you're able to -- 15:53

13 Q. [REDACTED]. I'm sorry to interrupt, but 15:53

14 when you say "[REDACTED]," what does that mean? 15:53

15 MR. FALCONER: Yeah. Can you -- go ahead 15:53

16 and finish your last answer if you weren't finished. 15:53

17 THE WITNESS: Oh, sorry. 15:53

18 BY MR. LOESER: 15:53

19 Q. Sorry for interrupting. Go ahead. 15:53

20 A. So, for example, [REDACTED] 15:53

21 [REDACTED] 15:53

22 [REDACTED], meaning [REDACTED], 15:53

23 [REDACTED] 15:53

24 [REDACTED]. 15:53

25 Q. So you're talking about [REDACTED] 15:53

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1 [REDACTED] 15:53

2 [REDACTED], and then [REDACTED] 15:53

3 [REDACTED] 15:53

4 [REDACTED]? 15:54

5 A. So, again, I wouldn't put it that way 15:54

6 because I think what -- how you're describing it 15:54

7 makes it sound like [REDACTED] 15:54

8 [REDACTED]. 15:54

9 So my understanding is [REDACTED] a 15:54

10 [REDACTED] for example, [REDACTED] 15:54

11 [REDACTED] 15:54

12 [REDACTED] 15:54

13 [REDACTED]. 15:54

14 Q. [REDACTED] 15:54

15 [REDACTED]? 15:54

16 A. [REDACTED]. 15:54

17 Q. Okay. 15:54

18 MR. LOESER: Exhibit 19. 15:54

19 (Exhibit 19 marked for identification.) 15:55

20 BY MR. LOESER: 15:55

21 Q. This is an email -- Exhibit 19 is an email 15:55

22 string from Ime Archibong to, among others, you, 15:55

23 dated September 4th, 2012, Subject, "Re: [REDACTED]: 15:55

24 [REDACTED]." And it 15:55

25 is very long string, and I'm going to start at the 15:55

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1 very, very end of it and work through it. 15:55

2 So first, if you want to take a minute to 15:55

3 familiarize yourself with it, that's fine, and I 15:55

4 will ask you some specific questions that -- 15:55

5 A. Yes, please. 15:55

6 Q. Okay. Are you ready to answer a few 15:59

7 questions about this document? 15:59

8 A. I didn't read it fully, but sure. 15:59

9 Q. Okay. And then, I think you'll -- we will 15:59

10 work our way through it. 15:59

11 A. Okay. 15:59

12 Q. If you need to look at it more, that's, of 15:59

13 course, fine. 15:59

14 Okay. So the string ends on September 4, 15:59

15 2012. To go all the way back to the beginning of 15:59

16 the string, there is an email from [REDACTED], 15:59

17 dated October 31st, 2012, and the email is to you. 15:59

18 And he says: 15:59

19 "Jackie, Per our conversation, 15:59

20 attached are [REDACTED] 15:59

21 [REDACTED]. This was 15:59

22 the demo that [REDACTED], also 16:00

23 a few other shots for reference. Let 16:00

24 us know what else you need. Reminder, 16:00

25 this is highly confidential and

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1 sensitive so please treat appropriately."  
2 Do you see that? 16:00  
3 A. Yes. 16:00  
4 Q. And then you have an email that you send 16:00  
5 back to [REDACTED] in which you state:  
6 "Do you have a screenshot of the 16:00  
7 [REDACTED] 16:00  
8 [REDACTED]? Also, do you have any 16:00  
9 [REDACTED] 16:00  
10 [REDACTED]? This just looks 16:00  
11 like [REDACTED]?" 16:00  
12 So when you say "this just looks like [REDACTED] 16:00  
13 [REDACTED]," are you saying that it looks like [REDACTED] 16:00  
14 [REDACTED] 16:00  
15 [REDACTED]; right? 16:00  
16 MR. FALCONER: Objection. Form. 16:00  
17 THE WITNESS: I wouldn't say -- so I think 16:00  
18 how you are stating it [REDACTED]. I think what 16:00  
19 we are trying to say is like [REDACTED] 16:00  
20 [REDACTED]. 16:00  
21 BY MR. LOESER: 16:01  
22 Q. Okay. And that [REDACTED] 16:01  
23 [REDACTED], that's something that 16:01  
24 you would call [REDACTED]; right? 16:01  
25 A. Yes. 16:01

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1 Q. Okay. And, in fact, if you move up the 16:01  
2 string to -- there is an entry -- on August 31st, 16:01  
3 2012, there is an email from you. And at this 16:01  
4 point, you are having a conversation with Chris 16:01  
5 Daniels about this [REDACTED]. And 16:01  
6 you write: 16:01

7 "Agreed on getting more clarity 16:01  
8 around [REDACTED] as we are going 16:01  
9 to see this more and more with [REDACTED]. 16:01  
10 They're [REDACTED] 16:01  
11 [REDACTED] 16:01  
12 [REDACTED] 16:01  
13 [REDACTED] 16:01  
14 [REDACTED] 16:02  
15 [REDACTED] 16:02  
16 [REDACTED] 16:02  
17 [REDACTED]. " 16:02

18 A. I believe you added the word "share" in 16:02  
19 there but, yes, I see what you are saying. 16:02

20 Q. Okay. That's -- I'm not sure where I added 16:02  
21 that word, but what I read, minus that word, is what 16:02  
22 you wrote in this email; right? 16:02

23 A. Yes. 16:02

24 Q. Okay. And then you go on and say: 16:02

25 "They also making no promises or 16:02

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1 indication that [REDACTED] 16:02  
2 [REDACTED] 16:02  
3 [REDACTED] 16:02  
4 [REDACTED]. At this point, 16:02  
5 they [REDACTED] 16:02  
6 [REDACTED] 16:02  
7 [REDACTED] 16:02  
8 [REDACTED]. 16:02  
9 Can you explain to you -- explain to me what 16:02  
10 you mean there? 16:02  
11 A. In terms of -- I think -- so I don't 16:02  
12 remember specifically, but I think what I'm 16:03  
13 referencing to is like [REDACTED], like 16:03  
14 the ability to [REDACTED] 16:03  
15 [REDACTED]. 16:03  
16 Q. All right. And when you say "at this point, 16:03  
17 they [REDACTED] 16:03  
18 [REDACTED]," what do you mean? What 16:03  
19 would be [REDACTED]? 16:03  
20 A. So like I said in there, [REDACTED] 16:03  
21 [REDACTED] 16:03  
22 [REDACTED] 16:03  
23 [REDACTED]. 16:03  
24 Q. And so that would be [REDACTED] 16:03  
25 [REDACTED] 16:03

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1 [REDACTED]; right? 16:03

2 A. So, I wouldn't say it's about [REDACTED] 16:03

3 [REDACTED]. It would be [REDACTED] 16:04

4 [REDACTED]. 16:04

5 Q. Right. And then [REDACTED] 16:04

6 [REDACTED]; right? It doesn't just -- 16:04

7 A. In Facebook -- 16:04

8 Q. -- [REDACTED] 16:04

9 [REDACTED]; right? 16:04

10 A. Well, it's based on [REDACTED]. 16:04

11 Q. Okay. [REDACTED] 16:04

12 [REDACTED]. 16:04

13 A. It's based off of [REDACTED] 16:04

14 [REDACTED]. 16:04

15 Q. Okay. We can go up the string. On the next 16:04

16 page, there's an email from Mike Vernal, September 16:04

17 1st, 2012, and he writes: 16:04

18 "This seems [REDACTED] 16:04

19 [REDACTED], right? They're 16:04

20 [REDACTED] 16:04

21 [REDACTED], 16:04

22 [REDACTED], 16:04

23 [REDACTED] ([REDACTED] 16:05

24 [REDACTED] 16:05

25 [REDACTED]) [REDACTED], 16:05

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1 [REDACTED] ([REDACTED])." 16:05

2 Do you understand what he is saying there? 16:05

3 A. I don't understand his intent behind that. 16:05

4 Q. Do you understand what he means by "[REDACTED]" 16:05

5 [REDACTED]"? 16:05

6 A. No, I don't. 16:05

7 Q. Okay. That -- to you, that doesn't mean 16:05

8 [REDACTED]? 16:05

9 MR. FALCONER: Objection. Asked and 16:05

10 answered. 16:05

11 THE WITNESS: I -- yeah. I don't know. 16:05

12 BY MR. LOESER: 16:05

13 Q. Okay. Let's go down. He says: 16:05

14 "I really think two things: 16:05

15 "1/There needs to be some kind of 16:05

16 [REDACTED] here; either [REDACTED] 16:05

17 [REDACTED], 16:05

18 or [REDACTED] 16:05

19 [REDACTED]."

20 Do you understand that? 16:05

21 A. I don't understand it in the context that 16:05

22 he's saying it, which is probably more technical 16:06

23 than I'm familiar with it. 16:06

24 Q. Okay. Isn't he saying that in its -- 16:06

25 [REDACTED], [REDACTED] 16:06

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1 [REDACTED] 16:06  
2 [REDACTED]; 16:06  
3 right? Isn't that pretty clear? 16:06  
4 A. So I wouldn't state it that way. So, again, 16:06  
5 like I mentioned earlier, it's about [REDACTED] 16:06  
6 [REDACTED] 16:06  
7 [REDACTED]. [REDACTED] 16:06  
8 [REDACTED]. 16:06  
9 Q. Okay. Then we can go to the first page of 16:06  
10 the string. And this conversation has continued for 16:06  
11 quite a while about [REDACTED] 16:06  
12 [REDACTED] 16:06  
13 [REDACTED]. 16:07  
14 And if you look at your email on September 16:07  
15 3rd, 2012, from you to Justin Osofsky and Douglas 16:07  
16 Purdy, among others, you write: 16:07  
17 "UPDATE - positive conversation 16:07  
18 around [REDACTED]." 16:07  
19 Is that right? 16:07  
20 A. Correct. 16:07  
21 Q. And [REDACTED] was an important concept for 16:07  
22 Facebook with its partners; right? 16:07  
23 A. So, again, I can't reflect on that 16:07  
24 generally, but in the case of [REDACTED], yes. 16:07  
25 MR. LOESER: Why don't we take a 10-minute 16:08

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1 break. 16:08

2 THE VIDEOGRAPHER: This marks -- this marks 16:08

3 the end of media No. 4 in the deposition of Jackie 16:08

4 Chang. Going off the record. The time is 4:08. 16:08

5 (Off the record.) 16:08

6 THE VIDEOGRAPHER: This marks the beginning 16:22

7 of media No. 5 in the deposition of Jackie Chang. 16:22

8 We are back on the record. The time is 4:22. 16:22

9 BY MR. LOESER: 16:22

10 Q. Miss Chang, we've talked a lot about the 16:22

11 planning for the rollout of Platform 3, and I want 16:22

12 to make sure the record is clear on what happened in 16:23

13 that planning and after the rollout. 16:23

14 As we saw in the materials we went through, 16:23

15 the new Platform 3 deprecated friends permissions 16:23

16 and read permissions; is that right? 16:23

17 A. Sorry. What are you referencing to? Or am 16:23

18 I supposed to look at a document? 16:23

19 Q. No, you don't need to look at a document. I 16:23

20 just -- we have been through the documents. I just 16:23

21 want to make sure it's clear to the -- clear on the 16:23

22 record that those documents showed that with 16:23

23 Platform 3, friends permissions and read permissions 16:23

24 were deprecated; right? 16:23

25 A. Again, I don't know specifically so whatever 16:23

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1 was reflected in the document. 16:23

2 Q. Okay. And as the documents show as well, 16:23

3 [REDACTED] 16:23

4 [REDACTED]; right? 16:23

5 MR. FALCONER: Objection. Form. 16:23

6 THE WITNESS: Again, I don't -- I don't 16:23

7 remember where I could say with precise like a 16:23

8 hundred percent certainty. I don't know. 16:24

9 BY MR. LOESER: 16:24

10 Q. But you could say generally that [REDACTED] 16:24

11 [REDACTED] [REDACTED]? 16:24

12 A. Again, I don't feel comfortable because I 16:24

13 don't remember. 16:24

14 Q. Okay. And [REDACTED] 16:24

15 [REDACTED] 16:24

16 [REDACTED] that you 16:24

17 described in your email and the slide you prepared 16:24

18 on that topic; right? 16:24

19 MR. FALCONER: Objection. 16:24

20 BY MR. LOESER: 16:24

21 Q. Let me remind you [REDACTED]. 16:24

22 There was [REDACTED] 16:24

23 [REDACTED]. 16:24

24 Do you remember that slide that showed [REDACTED] 16:24

25 [REDACTED]? 16:24

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1 A. Yes. I remember the slide. 16:24

2 Q. Right. And you helped develop [REDACTED] 16:24

3 [REDACTED]; right? 16:24

4 A. I don't remember specifically. 16:24

5 Q. But your email appears to indicate that you 16:24

6 helped to develop [REDACTED]; right? 16:24

7 A. So, again, whatever the email says, but I 16:24

8 don't remember that specific moment in time. 16:25

9 Q. And Miss Chang, do you know how many total 16:25

10 [REDACTED] 16:25

11 [REDACTED]? 16:25

12 A. No, I don't. 16:25

13 Q. How about [REDACTED]? 16:25

14 A. I don't. 16:25

15 Q. Do you know if there were [REDACTED] 16:25

16 [REDACTED] 16:25

17 [REDACTED]? 16:25

18 A. I don't know. 16:25

19 Q. Who would know that? 16:25

20 A. I don't -- I don't know. 16:25

21 Q. Okay. You have no idea? 16:25

22 A. Not for an individual person, no. 16:25

23 Q. And so in your work now with academic 16:25

24 partnerships, if you wanted to figure out if an 16:25

25 academic partner had continued access to friends 16:25

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1 permissions, for example, who would you go ask to 16:25  
2 find that out? 16:25  
3 A. That's not possible. 16:25  
4 Q. It's not possible for an academic researcher 16:25  
5 to have access to friends permissions? 16:26  
6 A. No. We don't offer that through the 16:26  
7 researcher API. 16:26  
8 Q. And when you were working with other types 16:26  
9 of partners, if you wanted to find out if that 16:26  
10 [REDACTED], do you 16:26  
11 have any recollection at all as to who you would go 16:26  
12 to to find that out? 16:26  
13 A. I don't know -- I don't know specifically 16:26  
14 off the top of my head. I don't know, but I 16:26  
15 don't -- yeah. 16:26  
16 Q. So, again, I want to make sure I understand 16:26  
17 and use the right terminology. If [REDACTED] 16:26  
18 [REDACTED] 16:26  
19 [REDACTED], does that by definition mean that the 16:26  
20 [REDACTED]? 16:26  
21 A. Say that again, please. 16:26  
22 Q. If a [REDACTED] 16:26  
23 [REDACTED] 16:26  
24 [REDACTED], does that by definition mean that 16:26  
25 [REDACTED]? 16:27

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1 MR. FALCONER: Objection. Form. 16:27

2 THE WITNESS: I don't know. 16:27

3 MR. FALCONER: Go ahead. 16:27

4 THE WITNESS: Sorry. I don't know in 16:27

5 specificity in terms of like what you're referring 16:27

6 to, meaning the technical language, I don't know. I 16:27

7 don't know if it's a whitelist. I don't know. 16:27

8 BY MR. LOESER: 16:27

9 Q. Okay. Do you know if [REDACTED] 16:27

10 [REDACTED] 16:27

11 [REDACTED], but that there are other 16:27

12 ways as well? 16:27

13 A. I don't know. 16:27

14 Q. And is it your understanding that a [REDACTED] 16:27

15 [REDACTED], and through that [REDACTED] 16:27

16 [REDACTED], is that 16:27

17 considered a whitelist, or is that something 16:27

18 different? 16:27

19 A. So, again, I don't -- I don't remember or 16:27

20 know what that would be. 16:27

21 Q. Okay. Do you know if Facebook whitelisted 16:28

22 certain app developers so that they had continued 16:28

23 access to friends permissions after Platform 3 was 16:28

24 implemented? 16:28

25 A. So, again, I don't remember it so I don't 16:28

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1 know if it could be classified as whitelist. 16:28

2 Q. The term "whitelist" is not one you have 16:28

3 used so frequently that you remember to this day 16:28

4 what it means? 16:28

5 A. No. 16:28

6 Q. Do you have any idea of the process that's 16:28

7 used to determine [REDACTED] 16:28

8 [REDACTED] 16:28

9 [REDACTED]? 16:28

10 A. Yeah. I don't recall it. 16:28

11 Q. Do you know if Facebook keeps records of 16:28

12 [REDACTED]? 16:28

13 A. I don't know. 16:28

14 Q. You have no recollection at all as to 16:28

15 whether that information is collected and maintained 16:29

16 in one place so that someone could easily find out 16:29

17 [REDACTED] 16:29

18 [REDACTED]? 16:29

19 A. So again -- 16:29

20 MR. FALCONER: Asked and answered. 16:29

21 THE WITNESS: -- that's outside my scope, so 16:29

22 I don't know. 16:29

23 BY MR. LOESER: 16:29

24 Q. Now, if we go back to slide -- I'm sorry, 16:29

25 deck -- Exhibit 12 for a minute. And if you look at 16:29

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1 the fourth page "[REDACTED]." 16:29

2 This indicates that of these categories here, [REDACTED] 16:29

3 [REDACTED] 16:29

4 [REDACTED] 16:30

5 [REDACTED] -- 16:30

6 [REDACTED]"; right? 16:30

7 A. So I don't know. 16:30

8 MR. FALCONER: Objection to form. 16:30

9 BY MR. LOESER: 16:30

10 Q. And then on [REDACTED], that also seems to 16:30

11 indicate that that [REDACTED] 16:30

12 [REDACTED], right, "[REDACTED]"; 16:30

13 right? 16:30

14 A. Again, I don't remember. 16:30

15 Q. And then if you look at the last one, 16:30

16 "[REDACTED]," which your email talked about quite a 16:30

17 bit. Those are -- those [REDACTED] 16:30

18 [REDACTED]; is that right? That 16:30

19 means [REDACTED]; 16:30

20 right? 16:30

21 A. I don't know. 16:30

22 Q. And you have no recollection whatsoever 16:30

23 about [REDACTED] 16:30

24 [REDACTED]? 16:31

25 A. Correct. I don't remember. 16:31

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1 MR. FALCONER: Derek, you're on mute. I 16:32  
2 don't know if you did that on purpose. 16:32  
3 MR. LOESER: I did not do that on purpose. 16:32  
4 BY MR. LOESER: 16:32  
5 Q. So if we can go back to Exhibit 8. 16:32  
6 DEPOSITION REPORTER: Excuse me, Counsel,  
7 which exhibit?  
8 MR. LOESER: This is Exhibit 8. This is an 16:32  
9 Excel file. 16:32  
10 BY MR. LOESER:  
11 Q. I want to make sure I understand. This is 16:32  
12 an exhibit of [REDACTED] 16:32  
13 [REDACTED]; right? This is attached to a document 16:32  
14 that explained that that's what this is. 16:32  
15 MR. FALCONER: Objection. Form. 16:32  
16 BY MR. LOESER: 16:33  
17 Q. I'll just refer -- Exhibit 7 is an email 16:33  
18 from KP to, among others, you, and it attaches [REDACTED] 16:33  
19 [REDACTED]. 16:33  
20 Sorry. 16:33  
21 So these are [REDACTED] 16:33  
22 [REDACTED]. And, again, I just want to make sure 16:33  
23 if you have any understanding of what [REDACTED] 16:33  
24 [REDACTED], [REDACTED] 16:33  
25 [REDACTED]. 16:33

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1 So if an app -- let's take [REDACTED] because 16:33  
2 it's short. If an app has [REDACTED], 16:33  
3 [REDACTED], 16:33  
4 what does that mean [REDACTED]? 16:33

5 A. So again, I don't -- 16:33

6 MR. FALCONER: Objection. Form. 16:33

7 Go ahead. 16:33

8 THE WITNESS: Sorry. I don't think -- I 16:33  
9 don't know if that's the document that was being 16:33  
10 referenced so I -- and I don't know specifically. 16:33

11 BY MR. LOESER: 16:34

12 Q. Okay. Do you have any understanding of how 16:34  
13 these [REDACTED] 16:34  
14 [REDACTED]? And, again, looking at [REDACTED], 16:34  
15 and this is a list of [REDACTED] 16:34  
16 [REDACTED] has. 16:34

17 Do you understand what [REDACTED] 16:34  
18 [REDACTED] 16:34  
19 [REDACTED]? 16:34

20 A. No, not specifically. 16:34

21 Q. Would it be a fair assumption that if 16:34  
22 [REDACTED], it 16:34  
23 can [REDACTED] 16:34  
24 [REDACTED]? 16:34

25 MR. FALCONER: Objection. Form. 16:34

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1 THE WITNESS: So, again, I don't -- I don't 16:34  
2 remember, so I can't assume. 16:34  
3 BY MR. LOESER: 16:34  
4 Q. Did you have any interaction with a partner 16:35  
5 in a discussion of the [REDACTED] 16:35  
6 [REDACTED] 16:35  
7 they said to you, Hey, [REDACTED] 16:35  
8 [REDACTED]? 16:35  
9 A. I don't remember specifically like 16:35  
10 [REDACTED]. 16:35  
11 Q. Okay. Do you remember any conversations at 16:35  
12 all about [REDACTED] with any partner? 16:35  
13 A. I don't remember specifically anything about 16:35  
14 [REDACTED]. 16:35  
15 Q. Do you remember anything generally about 16:35  
16 [REDACTED]? And particularly, I'm asking 16:35  
17 if any partner that you have worked with raised that 16:35  
18 as a [REDACTED] 16:35  
19 [REDACTED]. 16:35  
20 A. I don't -- I don't -- I don't recall. 16:35  
21 MR. LOESER: Okay. We can go to Exhibit 21. 16:36  
22 (Exhibit 20 marked for identification.) 16:36  
23 MR. LOESER: Oh, is it 20? Yeah. 16:36  
24 While that's being loaded, for the record, 16:36  
25 this is an email from Simon Cross to, among others, 16:36

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1 yourself, dated October 24th, 2013, "Subject: 16:37  
2 [REDACTED] - feedback by 16:37  
3 end of day Sunday, please." With attachment, 16:37  
4 "[REDACTED]," attaching an 16:37  
5 Excel spreadsheet. 16:37  
6 BY MR. LOESER: 16:37  
7 Q. Do you see that document, Miss Chang? 16:37  
8 A. I see the email, yes. 16:37  
9 Q. So this email starts with Mr. Cross saying: 16:37  
10 "Hi guys, Over the last few weeks, 16:37  
11 you'll have noticed Engineering have 16:37  
12 [REDACTED] 16:37  
13 [REDACTED]. Going forward, this 16:37  
14 tool is going to be a much larger part 16:37  
15 of our lives -- it's where [REDACTED] 16:37  
16 [REDACTED]. 16:37  
17 [REDACTED] is about to 16:37  
18 introduce even [REDACTED] -- such 16:38  
19 [REDACTED] 16:38  
20 [REDACTED], or to be 16:38  
21 able to [REDACTED] 16:38  
22 [REDACTED]. " 16:38  
23 Did I read that accurately? 16:38  
24 A. Yes, you -- yes. 16:38  
25 Q. Do you recall receiving this email and the 16:38

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1 attachment that it provides? 16:38

2 A. I don't recall it specifically. 16:38

3 Q. Do you recall it at all? 16:38

4 A. No, I don't. 16:38

5 Q. And can you tell me what "[REDACTED]" 16:38

6 are? 16:38

7 A. I don't know. 16:38

8 Q. You have no recollection whatsoever? 16:38

9 A. No. Again, I'm not -- I'm not the technical 16:38

10 person, so I just don't -- I don't know technically 16:38

11 what it would mean. 16:38

12 Q. Okay. Do you know what the [REDACTED] 16:38

13 [REDACTED] was? 16:38

14 A. Not specifically. I've heard of it, but I 16:38

15 don't know it in detail. 16:39

16 Q. Well, what have you heard about it? 16:39

17 A. It looks like some sort of [REDACTED] 16:39

18 tool. 16:39

19 Q. And what does that mean? 16:39

20 A. It [REDACTED]. 16:39

21 Q. Who does it [REDACTED] to? 16:39

22 A. So, again, I don't -- I don't know the 16:39

23 technical specifics, so I don't feel comfortable 16:39

24 talking about it in depth because I might 16:39

25 mischaracterize it. 16:39

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1 Q. Okay. You've said all that you feel 16:39  
2 comfortable saying about it? 16:39

3 A. Well, like all that I know about it. 16:39

4 Q. And before I asked you if there was [REDACTED] 16:39

5 [REDACTED], and this seems to 16:39

6 indicate that [REDACTED] 16:39

7 [REDACTED]. 16:39

8 Does that refresh your recollection about 16:39

9 [REDACTED]? 16:39

10 A. No. 16:39

11 Q. Okay. And this uses the term "[REDACTED] 16:40

12 [REDACTED]," which previously we saw you were 16:40

13 tasked with various things having to do with 16:40

14 [REDACTED]. 16:40

15 Can you provide any more information on your 16:40

16 understanding of [REDACTED]? 16:40

17 MR. FALCONER: Objection. Form. 16:40

18 THE WITNESS: No. Again, this wasn't the 16:40

19 top of like my -- my focus, so I don't really have a 16:40

20 lot of recollection around this. 16:40

21 BY MR. LOESER: 16:40

22 Q. Do you recall that based on the information 16:40

23 that was sent to you here and the description of 16:40

24 this email, there were [REDACTED] 16:40

25 [REDACTED] 16:40

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1 [REDACTED]? 16:40

2 A. I -- I don't know technically. 16:40

3 Q. Do you recall whether you were concerned 16:40

4 about [REDACTED] 16:41

5 [REDACTED]? 16:41

6 A. I don't remember. 16:41

7 Q. And you see in that first paragraph that as 16:41

8 part of [REDACTED], there were going to 16:41

9 be [REDACTED]? Do you see where it says 16:41

10 that [REDACTED], among other things, were 16:41

11 going to [REDACTED] 16:41

12 [REDACTED], or to be [REDACTED] 16:41

13 [REDACTED]? 16:41

14 So is that indicating to you that [REDACTED] 16:41

15 [REDACTED] 16:41

16 [REDACTED]? 16:41

17 A. Can I read -- sorry, can I have one moment 16:41

18 to read? I just haven't had a chance. Are you 16:41

19 looking at the second paragraph? 16:41

20 Q. I'm just looking at the first paragraph 16:41

21 where it says. 16:42

22 A. Okay. Sorry, can you repeat the question? 16:42

23 Q. Yeah, I'm trying to make sure I understand 16:42

24 your knowledge of [REDACTED] 16:42

25 [REDACTED] 16:42

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1 [REDACTED] . 16:42

2 A. So I -- 16:42

3 MR. FALCONER: Objection. Form. 16:42

4 Go ahead. 16:42

5 THE WITNESS: I don't remember enough to be 16:42

6 able to make those conclusions, and I also just 16:42

7 don't know if you're interchanging technical terms 16:42

8 that I can't really speak to. 16:42

9 BY MR. LOESER: 16:42

10 Q. So what was your job in October of 2013? 16:42

11 A. I believe it was partner manager. 16:42

12 Q. And so if you look at the next paragraph it 16:43

13 says: 16:43

14 "Today there are [REDACTED], 16:43

15 [REDACTED] and [REDACTED] - 16:43

16 [REDACTED] in the system. [REDACTED] 16:43

17 are important -- they [REDACTED] 16:43

18 [REDACTED], and 16:43

19 [REDACTED]. " 16:43

20 Do you understand what "[REDACTED]" are? 16:43

21 A. Not in -- not in the technical sense, no. 16:43

22 Q. Do you understand it in any sense? 16:43

23 A. Other than what I said earlier, which is 16:43

24 it's some [REDACTED]. 16:43

25 Q. This says: 16:43

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1 "This tool will be the primary way we 16:44  
2 manage [REDACTED], 16:44  
3 so it should [REDACTED] and 16:44  
4 allow us to manage [REDACTED] 16:44  
5 [REDACTED] 16:44  
6 [REDACTED]. " 16:44  
7 Do you see that? 16:44  
8 A. Yes, I see that. 16:44  
9 Q. Now, as the partner manager, were you aware 16:44  
10 of that use for [REDACTED]? 16:44  
11 A. I'm not sure I understand. 16:44  
12 Q. Did you use the [REDACTED] at all in 16:44  
13 your position at the time? 16:44  
14 A. I don't remember. There's a lot of tools, 16:44  
15 so I don't remember this one specifically. 16:44  
16 Q. So you don't remember the tool that was the 16:44  
17 primary way Facebook managed [REDACTED] 16:44  
18 [REDACTED] so it could "manage the [REDACTED] 16:44  
19 [REDACTED]"? 16:44  
20 MR. FALCONER: Objection. Form. 16:44  
21 THE WITNESS: Yes. Again, I don't remember. 16:44  
22 MR. LOESER: If we can go to Exhibit 22? 16:45  
23 (Exhibit 21 marked for identification.) 16:45  
24 MR. FALCONER: This is Exhibit 21; right? 16:46  
25 MR. LOESER: Yeah. 16:46

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1 BY MR. LOESER: 16:46

2 Q. Miss Chang, I'm showing you Exhibit 21, 16:46

3 which is an email from Paul Stepnowsky to, among 16:46

4 others, you. This is dated September 3rd, 2019, and 16:46

5 it contains a chat message; is that right? 16:46

6 A. Yes, I see that. 16:46

7 Q. And so in 2019, what was your position at 16:46

8 Facebook? 16:46

9 A. I believe it was product partnerships. 16:46

10 Q. Who is Paul Stepnowsky? 16:46

11 A. I don't remember specifically. 16:46

12 Q. Okay. So on September 3rd of 2019, there 16:46

13 was this chat, and it starts with Paul Stepnowsky 16:47

14 writing, "Hi Eli, Riana and I are working on a 16:47

15 TechCrunch inquiry, asking about [REDACTED] 16:47

16 [REDACTED]."

17 Do you -- first of all, is "TechCrunch" a 16:47

18 publication? 16:47

19 A. Yes. 16:47

20 Q. Are you familiar with that publication? 16:47

21 A. I know what it is, yes. 16:47

22 Q. And a "[REDACTED] 16:47

23 [REDACTED], " what does that mean? 16:47

24 A. I don't know. 16:47

25 Q. Do you know what a "[REDACTED] 16:47

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1       [REDACTED] " is? 16:47

2           A.    I don't know in this context. 16:47

3           Q.    Mr. Stepnowsky writes: 16:47

4                "We are trying to understand the 16:47

5                [REDACTED]. We 16:47

6                understand this [REDACTED] 16:47

7                [REDACTED] 16:47

8                [REDACTED], and we are hoping to learn 16:47

9                a bit more about [REDACTED] 16:48

10              [REDACTED]. " 16:48

11              Do you see that? 16:48

12           A.    Yes. 16:48

13           Q.    And you see down below, Paul Stepnowsky 16:48

14                adds, "Adding Jackie in case she knows." Right? 16:48

15           A.    Yes. 16:48

16           Q.    So Mr. Stepnowsky thought that you would be 16:48

17                knowledge about [REDACTED] 16:48

18                [REDACTED]; right? 16:48

19           A.    Yes. It seems so. 16:48

20           Q.    Down below a little bit, Amit Sangani says, 16:48

21                "[REDACTED]. [REDACTED] 16:49

22                [REDACTED] -- 16:49

23                (Clarification requested by Reporter.)

24           BY MR. LOESER:

25           Q.    Amit Sangani writes:

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1 " [REDACTED] . [REDACTED]  
2 [REDACTED]  
3 [REDACTED] 16:49  
4 [REDACTED]. Eddie O'Neil, PM Director, is 16:49  
5 [REDACTED]. " 16:49  
6 Do you see that? 16:49  
7 A. Yes. 16:49  
8 Q. And Eddie O'Neil was the product manager 16:49  
9 director, is that what that means? 16:49  
10 A. Yes. 16:49  
11 Q. And what does it mean to be [REDACTED] -- and 16:49  
12 I assume that's [REDACTED]. What does it mean to be 16:49  
13 the "[REDACTED]"? 16:49  
14 A. I believe it's [REDACTED]. 16:49  
15 Q. Okay. And is that because [REDACTED] 16:49  
16 [REDACTED] or 16:49  
17 [REDACTED]? 16:49  
18 A. So I don't know enough around the rules for 16:49  
19 that to -- I don't know. 16:50  
20 Q. If you look down a little further in the 16:50  
21 chat, Mr. Stepnowsky says: 16:50  
22 "We are having trouble determining if 16:50  
23 [REDACTED]. " 16:50  
24 Can you explain why it would be hard to 16:50  
25 determine if [REDACTED]? 16:50

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1 MR. FALCONER: Objection. Form. 16:50

2 THE WITNESS: So I don't know specifically. 16:50

3 Again, I'm not technical, which is why I believe I 16:50

4 referred to partner engineering. 16:51

5 BY MR. LOESER: 16:51

6 Q. All right. We can run down the chat, to the 16:51

7 next page. Alonso Fernandez Baptista, on September 16:51

8 3rd, 2019, writes: 16:51

9 "In 2011 [REDACTED] 16:51

10 [REDACTED], only 16:51

11 to [REDACTED] 16:51

12 [REDACTED]. 16:51

13 At around Q4 2016 and Q2 2017 we 16:51

14 started [REDACTED] 16:51

15 [REDACTED] 16:51

16 [REDACTED] 16:51

17 [REDACTED]. We wanted to get a sense 16:51

18 of how it helped [REDACTED] 16:51

19 [REDACTED], how it helped 16:51

20 [REDACTED] 16:51

21 [REDACTED] and how it helped [REDACTED] 16:51

22 [REDACTED] 16:51

23 [REDACTED]. " 16:52

24 And then I'm moving forward a bit:

25 "In Q4 2017 we decided [REDACTED] 16:52

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1 [REDACTED]

2 [REDACTED]. All beta testing [REDACTED] 16:52

3 [REDACTED] 16:52

4 [REDACTED]. " 16:52

5 So do you have any understanding at all of 16:52

6 what happened here? 16:52

7 A. Not specifically. I believe at that time, I 16:52

8 was just moving out of Internet.org back into 16:52

9 product partnerships, so I don't -- I don't know the 16:52

10 history of a lot of it. 16:52

11 Q. So is it a fair read to say that [REDACTED] 16:52

12 [REDACTED] to what I refer to as 16:52

13 "[REDACTED]" and because of that, [REDACTED] 16:52

14 [REDACTED] 16:52

15 [REDACTED]? 16:52

16 MR. FALCONER: Objection. Form and 16:52

17 foundation. 16:53

18 THE WITNESS: Again, I don't know the 16:53

19 history, and I don't know like the whole background 16:53

20 that Alonso is providing, so I can't speak on his 16:53

21 behalf. 16:53

22 BY MR. LOESER: 16:53

23 Q. All right. If you go down a bit farther, 16:53

24 Mr. Stepnowsky says: 16:53

25 "Got it. I also think that [REDACTED] 16:53

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1 [REDACTED] 16:53  
2 [REDACTED] 16:53  
3 [REDACTED]. " 16:53  
4 Can you tell me what it means [REDACTED] 16:53  
5 [REDACTED]? 16:53  
6 A. I -- again, a lot of these are very 16:53  
7 technically nuanced, so I don't know what the 16:53  
8 difference is of them or what they are. 16:53  
9 Q. You understand that if a permission or an 16:53  
10 API is publicly accessible, that means that anyone 16:53  
11 can determine publicly what in it exists? 16:53  
12 A. Say that again. 16:53  
13 Q. If a developer wants to know what are all 16:53  
14 the publicly available APIs, that is something that 16:53  
15 they can presumably go online or get from Facebook 16:53  
16 from public sources? 16:54  
17 A. So they can go to Face- -- 16:54  
18 developer.Facebook.com. They could read about it 16:54  
19 and then they can apply through the developer 16:54  
20 platform process. 16:54  
21 Q. Okay. [REDACTED] 16:54  
22 [REDACTED] 16:54  
23 [REDACTED] 16:54  
24 [REDACTED]? 16:54  
25 A. So, again, I am not the technical expert 16:54

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1 here, and I don't know in that nuance of how you're 16:54  
2 referring if [REDACTED], 16:54  
3 meaning [REDACTED] and whatever else you were 16:54  
4 referring to. 16:54

5 MR. LOESER: We can go to the next exhibit. 16:54  
6 This should be Exhibit 22 by my count. My tabs are 16:55  
7 off now, so I will be making a lot of mistakes, I'm 16:55  
8 sure. 16:55

9 MR. FALCONER: They are off by 1. It would 16:55  
10 be easier if they were off by like 46. 16:55

11 (Exhibit 22 marked for identification.) 16:55

12 BY MR. LOESER: 16:55

13 Q. Miss Chang, I'm showing you what's been 16:55  
14 marked Exhibit 22, which is an email from Simon 16:55  
15 Cross to Eddie O'Neil, dated March 27, 2014. 16:55  
16 "Subject: Forward: [REDACTED], "Attachments: 16:55  
17 [REDACTED], " and some other letters. 16:56

18 Do you see that? 16:56

19 A. Yes. 16:56

20 Q. And the email below that indicates that 16:56  
21 there's a thread about "[REDACTED]." 16:56

22 A. Can I read that? 16:56

23 Q. Sure. 16:56

24 A. Thank you. Okay. 16:57

25 Q. Miss Chang, this is another email thread 16:57

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1 about [REDACTED] 16:57

2 [REDACTED]. And do you see 16:57

3 the reference to -- well, let's look at the email at 16:57

4 the top. It says: 16:57

5 "Here's the whole thread about 16:57

6 [REDACTED]. Given the 16:57

7 other stuff, I guess we need to tell 16:57

8 them [REDACTED] 16:57

9 [REDACTED]. Concur?" 16:57

10 Do you see that? 16:57

11 A. Yes. 16:57

12 Q. And then in the email below from you to 16:58

13 Aditya Koolwal and Simon Cross, among others, dated 16:58

14 March 24, 2014, "Subject: Re: [REDACTED]," you 16:58

15 provide some fairly specific information about the 16:58

16 topic of [REDACTED]; is that right? 16:58

17 A. Yes. 16:58

18 Q. Okay. So this shows your involvement in 16:58

19 this -- in this task of [REDACTED]; 16:58

20 right? 16:58

21 A. Yes, but I don't recall specifically. 16:58

22 Q. Okay. And it looks like you did some pretty 16:58

23 detailed work here. You say that you, "synced up 16:58

24 with Simon and [REDACTED] 16:58

25 [REDACTED]. I went ahead and [REDACTED] 16:58

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1 [REDACTED] 16:58

2 [REDACTED]. Could you look over and verify that 16:59

3 it's all correct as Simon is going to translate this 16:59

4 into a task for engineering? Additionally, can you 16:59

5 provide some additional clarifications/confirmations 16:59

6 for the below:" 16:59

7 Did I read that correctly? 16:59

8 A. Yes. 16:59

9 Q. Can you read your first bullet there in your 16:59

10 email. 16:59

11 A. "[REDACTED] 16:59

12 [REDACTED] 16:59

13 [REDACTED], do you 16:59

14 want to [REDACTED] 16:59

15 [REDACTED]? 16:59

16 This will allow us [REDACTED] 16:59

17 [REDACTED] 16:59

18 [REDACTED]. " 16:59

19 Q. So can you explain what you are describing 16:59

20 here? 16:59

21 A. I don't remember in detail where -- it would 16:59

22 be hard for me to explain in detail. I don't know. 17:00

23 Q. Okay. So what you say here is that -- and 17:00

24 again, this appears to be part of [REDACTED] 17:00

25 [REDACTED] 17:00

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1 [REDACTED]; right, which it looks like you 17:00  
2 were involved in a lot of ways in that process. 17:00  
3 Another one concerns [REDACTED]; right? 17:00  
4 MR. FALCONER: Objection. Form. 17:00  
5 THE WITNESS: So I don't know, but, yeah, I 17:00  
6 see the email. 17:00  
7 BY MR. LOESER: 17:00  
8 Q. Okay. And this suggests that -- that "[REDACTED] 17:00  
9 [REDACTED] 17:00  
10 [REDACTED]. " 17:00  
11 And so as you recall, when we went through 17:00  
12 [REDACTED] 17:00  
13 [REDACTED], some were [REDACTED] 17:00  
14 [REDACTED] and some 17:00  
15 were [REDACTED]; right? 17:00  
16 A. Sorry. In that -- in that PowerPoint slide? 17:01  
17 Q. Right. 17:01  
18 A. Yes, I remember the PowerPoint slide. 17:01  
19 Q. Okay. So this appears to be indicating that 17:01  
20 [REDACTED] 17:01  
21 [REDACTED], that your idea was to [REDACTED] 17:01  
22 [REDACTED] so that [REDACTED] 17:01  
23 [REDACTED]; is that 17:01  
24 right? 17:01  
25 A. So I don't remember specifically, but -- 17:01

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1 yes, it seems like I'm posing the question. 17:01

2 Q. So, certainly, as of the date of this email, 17:01

3 March 24, 2014, you knew that [REDACTED] 17:02

4 [REDACTED] 17:02

5 [REDACTED] 17:02

6 [REDACTED]; right? 17:02

7 A. So I don't know, at that moment in time. 17:02

8 Q. So looking at what you wrote, you're telling 17:02

9 me you can't determine, based on what you wrote, 17:02

10 that [REDACTED] 17:02

11 [REDACTED] 17:02

12 [REDACTED]? 17:02

13 A. I know what I wrote, but I don't remember it 17:02

14 in specificity where I would know the full context 17:02

15 of what you're implying. 17:02

16 Q. Okay. Do you have any reason to believe 17:02

17 that the information that you wrote in this email is 17:02

18 inaccurate? 17:02

19 A. I don't know. 17:02

20 Q. You don't have any reason to believe that, 17:02

21 do you? 17:02

22 A. I mean, there's always a possibility of 17:02

23 inaccuracy, but I don't know. It's not my intent to 17:02

24 be inaccurate. 17:03

25 Q. Did you have any involvement at any point in 17:03

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1 your career at Facebook with screening third-party 17:03  
2 developers before -- well, strike that. 17:03  
3 Do you know whether Facebook screened 17:03  
4 third-party developers or their apps before granting 17:03  
5 them access to Graph API? 17:03  
6 A. I -- 17:03  
7 MR. FALCONER: Object to form. 17:03  
8 THE WITNESS: Sorry. I don't understand. 17:03  
9 Can you give me an example. 17:04  
10 BY MR. LOESER: 17:04  
11 Q. Sure. Let me ask again. Do you know 17:04  
12 whether Facebook screens apps or developers before 17:04  
13 allowing them to access the Facebook Graph? 17:04  
14 MR. FALCONER: Objection. Form. 17:04  
15 Go ahead. 17:04  
16 THE WITNESS: So we have like a public 17:04  
17 workflow that has a developer operations team that 17:04  
18 reviews the apps, so I don't -- I don't know if 17:04  
19 that's what you're referring to. 17:04  
20 BY MR. LOESER: 17:04  
21 Q. And do you know anything about the process 17:04  
22 for reviewing apps, how that's done? 17:04  
23 A. Not in detail. 17:04  
24 Q. Do you know if that process changed after 17:04  
25 2012? 17:04

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1           A.     So I can't really speak to that process. I 17:04  
2     don't know. 17:04

3           Q.     Do you know if Facebook reviewed privacy 17:04  
4     policies of third-party apps to ensure that they 17:05  
5     complied with Facebook's own policies before 17:05  
6     providing those apps access to Facebook Graph? 17:05

7           MR. FALCONER: Objection. Form. 17:05

8           THE WITNESS: Sorry. Can you say that 17:05  
9     again? 17:05

10          BY MR. LOESER: 17:05

11          Q.     Do you know if Facebook reviewed the privacy 17:05  
12     policies of third-party apps? 17:05

13          A.     I -- I don't know. 17:05

14          MR. FALCONER: Objection.

15          THE WITNESS: I'm sorry. 17:05

16          MR. FALCONER: Yeah. Just same objection. 17:05

17          BY MR. LOESER: 17:05

18          Q.     Are you familiar with the Facebook data use 17:05  
19     policy? 17:05

20          A.     Not in -- not -- not specifically. I guess 17:05  
21     it's in what context? 17:05

22          Q.     Well, have you ever read any version of 17:05  
23     Facebook's data use policies? 17:06

24          A.     So I don't remember that specifically, but 17:06  
25     if you're talking about like a -- like a platform 17:06

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1 usage, I mean, I know we have platform terms. 17:06

2 Q. Well, do you -- have you ever reviewed 17:06

3 Facebook's platform policies, platform developer 17:06

4 policies? 17:06

5 A. I mean, I have read it, but I don't remember 17:06

6 all the details of it. 17:06

7 Q. And what about the Facebook data use 17:06

8 policies specifically? Is that something you recall 17:06

9 ever reading? 17:06

10 A. I don't remember. 17:06

11 Q. During all your time working with Facebook 17:06

12 partners, did you ever become aware of any violation 17:06

13 of Facebook policies by any app developer or 17:06

14 partner? 17:06

15 A. Sorry. In what sense? 17:06

16 Q. In any sense. 17:06

17 A. I mean, I've heard that it's happened, but I 17:06

18 don't recall anything specific. 17:07

19 Q. Can you recall any specific instance of a 17:07

20 partner with whom you worked violating any Facebook 17:07

21 platform policy? 17:07

22 A. Again, I don't remember specifically but, 17:07

23 yeah, it's definitely possible. 17:07

24 Q. But you never saw it happen; is that what 17:07

25 you are saying? 17:07

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1           A.     I don't remember. I don't remember every     17:07  
2     instance of my interactions so I don't know.             17:07

3           Q.     And there was no platform policy violation     17:07  
4     of any partner with whom you worked that you can         17:07  
5     specifically recall?   17:07

6           A.     Not specifically.                                 17:07

7           Q.     Do you remember generally any platform         17:07  
8     violations by any of the partners with whom you           17:07  
9     worked?   17:07

10          A.     I know that platform violations is possible,     17:07  
11     but I don't know specifically who or what.                 17:07

12          Q.     Are you aware that the data use policy has a     17:08  
13     provision that states, "If an application asks             17:08  
14     permission from someone else to access your                 17:08  
15     information, the application will be allowed to use         17:08  
16     that information only in connection with the person         17:08  
17     that gave the permission and no one else"?                 17:08

18                 MR. FALCONER: Objection. Form.                 17:08

19                 THE WITNESS: I don't know that line             17:08  
20     specifically off the top of my head. So I'll --             17:08  
21     assuming if you're reading it from an actual thing,         17:08  
22     yeah, that's --   17:08

23                 BY MR. LOESER:                                     17:08

24          Q.     And did you observe any situation in which     17:08  
25     that specific policy I mentioned was violated by any         17:08

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1 app or partner? 17:08

2 MR. FALCONER: Objection. Form. 17:08

3 THE WITNESS: So I don't remember. 17:08

4 MR. LOESER: It we can go to tab 25. 17:09

5 (Exhibit 23 marked for identification.) 17:09

6 BY MR. LOESER: 17:09

7 Q. Miss Chang, I'm showing you what's been 17:09

8 marked Exhibit 23, which is an email from you to 17:10

9 Eddie O'Neil, Marie Hagman and Simon Cross, dated 17:10

10 November 21, 2013, "Subject: [REDACTED] 17:10

11 [REDACTED]" and there 17:10

12 is an attachment [REDACTED]." 17:10

13 Do you see that? 17:10

14 A. Yes. 17:10

15 Q. And so you wrote an email and you provided 17:10

16 an attachment specifically regarding "[REDACTED] 17:10

17 [REDACTED]." 17:10

18 And take a minute to look at your email and 17:10

19 tell me if you recall what you are referring to in 17:10

20 the subject line of this email. 17:10

21 A. Sorry. I'm pulling up the document. Okay. 17:10

22 Q. So I'm looking at the subject of your email 17:12

23 that you wrote, "[REDACTED] 17:12

24 & [REDACTED]." 17:12

25 Do you understand what that refers to? 17:12

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1           A.    Not specifically, but I -- I see the email.   17:12

2           Q.    Okay.  And do you remember your role in       17:13

3 coming up with [REDACTED]?                               17:13

4           A.    I don't remember.  I would say there's been   17:13

5 a lot of processes through the years.  They blend       17:13

6 together so I don't remember this one specifically.   17:13

7           Q.    Okay.  So let's go through your email.  You   17:13

8 start:   17:13

9                "I went through a review with the               17:13

10 privacy XFN, legal, and policy team                   17:13

11 this week and have agreed upon the                   17:13

12 [REDACTED]."   17:13

13                So that's work that you did collecting       17:13

14 information from these other groups; is that right?   17:13

15           A.    No.  It sounds like I reviewed with those   17:13

16 groups and have aggregated their feedback.           17:13

17           Q.    Okay.  And then your next sentence says:   17:13

18                "Attached are supporting slides for           17:13

19 my findings and recommendations                   17:13

20 around the [REDACTED] and                               17:13

21 [REDACTED] and (2)                                       17:14

22 [REDACTED].   17:14

23                Below are the key points."  [As read.]       17:14

24                So this email presents the -- your findings   17:14

25 and recommendation around those two topics based       17:14

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1 upon your review with the privacy, XFN, legal and 17:14  
2 policy team; is that right? 17:14  
3 A. I believe so, but I -- again, I don't 17:14  
4 remember this specifically. 17:14  
5 Q. Okay. So at the time that you wrote this 17:14  
6 email, you appeared to have a good understanding of 17:14  
7 [REDACTED] 17:14  
8 [REDACTED]; is that right? 17:14  
9 A. I wouldn't assume that. 17:14  
10 Q. You wouldn't assume you had a good 17:14  
11 understanding, even though in this email you present 17:14  
12 your findings and recommendations regarding those 17:14  
13 topics? 17:14  
14 A. Correct. I wouldn't assume that because I'm 17:14  
15 working with many different groups, so I'm usually 17:14  
16 aggregating knowledge across, so I would not say I 17:14  
17 am the expert. 17:14  
18 Q. Okay. But they were your findings and your 17:14  
19 recommendations; is that right? 17:15  
20 A. Based off of what I collected at the time. 17:15  
21 Q. Your first key point here -- by the way, 17:15  
22 reviewing this email, do you recall what the -- what 17:15  
23 is referenced by [REDACTED]? 17:15  
24 A. Looking at that now, and I think you've been 17:15  
25 pointing out platform simplification, I do connect 17:15

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1 the two now. 17:15

2 Q. Okay. And you were very involved in tasks 17:15

3 relating to platform simplification; right? 17:15

4 A. I wouldn't assume that. 17:15

5 Q. You were involved enough to be responsible 17:15

6 for aspects of platform simplification; right? 17:15

7 A. I wouldn't assume that. 17:15

8 Q. Even for --

9 A. Being I supported -- I supported the work 17:15

10 stream, but I can't characterize because I don't 17:15

11 remember if that was my position, so that's why I 17:15

12 wouldn't assume that. 17:15

13 Q. But we have looked at email where you were 17:15

14 assigned a particular task with regard to platform 17:16

15 simplification; right? 17:16

16 A. So assigning to task doesn't mean I -- I own 17:16

17 that. 17:16

18 Q. What does it mean? 17:16

19 A. It means I'm assigned to task. 17:16

20 Q. Having been assigned the task, presumably 17:16

21 you learned something about it? 17:16

22 A. I guess. But, again, I don't know from that 17:16

23 moment in time. It's 2013, so I don't remember at 17:16

24 that moment in time. 17:16

25 Q. Okay. Well, let's look at what your key 17:16

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1 points were in your findings and recommendations. 17:16

2 The first one was: 17:16

3 "██████████ should not be 17:16

4 ██████████. We should put 17:16

5 the same ██████████ as we 17:16

6 do with ███ - this will ensure the 17:16

7 most optimal adoption by engineering." 17:16

8 What did you mean by that? 17:16

9 A. Again, I don't know. 17:17

10 Q. No memory whatsoever of what that finding 17:17

11 and recommendation meant? 17:17

12 A. I don't know between ██████████ how 17:17

13 it's blended, where I -- I don't know -- like I 17:17

14 don't recall enough between the two, the 17:17

15 differences. 17:17

16 Q. Okay. And what is "███"? 17:17

17 A. ██████████. 17:17

18 Q. Okay. And then, in your second key point 17:17

19 from your findings and recommendations you state: 17:17

20 "██████████ fall into two major 17:17

21 buckets: ██████████ and 17:17

22 ██████████." [As read.] 17:17

23 Do you recall dividing ██████████ into 17:17

24 those two buckets? 17:17

25 A. I don't remember. 17:17

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1 Q. Do those -- do [REDACTED] fall into those 17:17  
2 two buckets? 17:17

3 A. I don't know generally for them, but what it 17:17  
4 says in the email is what it says. But I don't -- I 17:17  
5 don't know if that's -- I don't know enough to know 17:17  
6 if that classification is true. 17:17

7 Q. But, presumably, when you wrote this email, 17:17  
8 you believed that that was true; right? 17:18

9 A. I don't know. 17:18

10 Q. Okay. You might have written an email in 17:18  
11 which you had no idea whether that information was 17:18  
12 true or not? 17:18

13 A. Again, I don't know. I don't remember that, 17:18  
14 so I don't want to make assertions for a moment in 17:18  
15 time that I can't remember. 17:18

16 Q. Okay. But it would be pretty unusual, don't 17:18  
17 you think, for you to write an email in which you 17:18  
18 make knowingly untrue assertions? 17:18

19 A. I wouldn't position it that way because this 17:18  
20 stuff is highly technical, so I think there's a high 17:18  
21 possibility for me not to know at all -- to all 17:18  
22 extent to say that it's completely true. 17:18

23 Q. So any email we pick up from this time 17:18  
24 period, maybe everything you said was wrong, maybe 17:18  
25 right. What I am asking is: You wouldn't knowingly 17:18

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1 present false information; right? 17:18

2 A. Not to my -- yeah, I wouldn't -- if I knew, 17:18

3 I wouldn't make an assertion. 17:18

4 Q. So if you could read what you've written for 17:18

5 "[REDACTED]" down after your description of 17:19

6 "[REDACTED]," your 17:19

7 second bucket is "[REDACTED]," and if you go 17:19

8 down to that bullet, could you read that bullet? 17:19

9 A. "[REDACTED]: These [REDACTED] 17:19

10 generally break out to" -- "breakout to 17:19

11 [REDACTED] (i.e. [REDACTED]) and [REDACTED] 17:19

12 [REDACTED] (i.e. [REDACTED] 17:19

13 [REDACTED]). They are typically riskier 17:19

14 because [REDACTED] 17:19

15 [REDACTED] 17:19

16 [REDACTED] 17:19

17 [REDACTED] 17:19

18 [REDACTED]. " 17:19

19 Q. And what did you mean by -- explain what you 17:19

20 meant by that sentence. 17:19

21 A. Again, I don't remember in that specific 17:19

22 moment, so I don't -- I -- I don't know enough to be 17:20

23 able to -- to interpret that. 17:20

24 Q. So as you sit here today, reading this 17:20

25 language means nothing to you? 17:20

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1 appropriate coverage. At the very 17:21  
2 least, this will put adequate notice 17:21  
3 for developers that (1) [REDACTED] 17:21  
4 [REDACTED], (2) you 17:21  
5 cannot [REDACTED], 17:21  
6 and (3) you cannot [REDACTED] 17:22  
7 [REDACTED]. " 17:22

8 Q. So what did you mean when you said 17:22  
9 "[REDACTED] 17:22  
10 [REDACTED], we will require the appropriate 17:22  
11 coverage"? 17:22

12 A. So I don't remember -- I don't remember at 17:22  
13 that time what that would be inferring to. 17:22

14 Q. As you sit here today, reading the words 17:22  
15 that you wrote, can you understand how the -- how 17:22  
16 [REDACTED] ility, how that 17:22  
17 would relate to whether you need appropriate 17:22  
18 coverage? 17:22

19 A. So, again, over time, my -- my 17:22  
20 understanding, things have changed. So I don't feel 17:22  
21 comfortable saying that I know what it meant back 17:22  
22 then. 17:22

23 And looking at it now, I would say 17:22  
24 "[REDACTED]" just means, you know, of [REDACTED] 17:22  
25 [REDACTED] but I don't know specifically what the 17:22

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1 criteria would be. 17:22

2 Q. And what is -- what do you mean by "[REDACTED]" 17:22

3 "[REDACTED]"? What does that pertain 17:22

4 to? 17:22

5 A. Again, I don't know. 17:22

6 Q. Would that suggest that some [REDACTED] 17:23

7 [REDACTED] than 17:23

8 other [REDACTED]? 17:23

9 A. So that would require me to assume. I don't 17:23

10 know. 17:23

11 Q. So, again, we're looking at another document 17:23

12 in which you're providing a recommendation about a 17:23

13 subject on which it appears you did a fair amount of 17:23

14 work, but sitting here today, you have utterly no 17:23

15 understanding of what you wrote. 17:23

16 A. Correct. 17:23

17 MR. FALCONER: Objection to form. 17:23

18 THE WITNESS: I mean, it was in 2013. I 17:23

19 worked on a lot of projects, so I don't remember 17:23

20 this in specificity. 17:23

21 BY MR. LOESER: 17:23

22 Q. And, then, if you look down to paragraph 5, 17:23

23 you write: 17:23

24 "[REDACTED]ivatized, Aldo 17:23

25 King would like to run a personal 17:23

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1 review of these and help us determine 17:23  
2 if we should [REDACTED] 17:23  
3 [REDACTED] 17:23  
4 [REDACTED]. " 17:24  
5 So do you recall what you meant by "[REDACTED] 17:24  
6 [REDACTED]"? 17:24  
7 A. If an [REDACTED] -- from [REDACTED] 17:24  
8 [REDACTED]. 17:24  
9 Q. Yeah. These are your words that you wrote, 17:24  
10 so do you have an understanding of what that means? 17:24  
11 A. Not in the context of that time because I 17:24  
12 don't remember at that very moment. 17:24  
13 Q. Well, what would it mean to you today? 17:24  
14 A. [REDACTED]. 17:24  
15 Q. And what does that mean? 17:24  
16 A. If it was a [REDACTED] 17:24  
17 [REDACTED]. 17:24  
18 Q. And why did [REDACTED]? 17:24  
19 A. I don't know. 17:24  
20 Q. Despite your work in this area, you have no 17:24  
21 recollection whatsoever about why [REDACTED] 17:24  
22 [REDACTED]? 17:24  
23 A. No. I can't generalize across the board, so 17:24  
24 I don't know. 17:25  
25 Q. I'm not asking you to generalize across the 17:25

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1 board. I'm asking if you have any understanding at 17:25  
2 all. 17:25

3 MR. FALCONER: Objection. Form. 17:25

4 THE WITNESS: Again, I don't remember, so I 17:25  
5 don't -- I can't really speak to it. 17:25

6 BY MR. LOESER: 17:25

7 Q. So if someone called you up today and said, 17:25  
8 Miss Chang, can you explain to me what the 17:25  
9 difference between [REDACTED], 17:25  
10 and why [REDACTED], 17:25  
11 you have no answer that you could provide? 17:25

12 A. Correct. I would -- I don't know because 17:25  
13 there is a lot of technical nuance, and I don't know 17:25  
14 what it would mean today. 17:25

15 Q. And you don't know what it would mean today 17:25  
16 and you don't know what it meant in 2013; right? 17:25

17 A. I don't remember. 17:25

18 Q. And the email outlining your findings and 17:25  
19 recommendations, based upon all the work you did to 17:25  
20 develop them, doesn't refresh your recollection in 17:25  
21 any way as to what that term means? 17:25

22 MR. FALCONER: Objection. Form. 17:26

23 THE WITNESS: Yes, it doesn't. Again, this 17:26  
24 wasn't -- this wasn't really like my -- I didn't 17:26  
25 really recall a lot around this because it wasn't my 17:26

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1 main thing I was focused on, so I -- I just don't 17:26  
2 recall a lot of it. 17:26  
3 BY MR. LOESER: 17:26  
4 Q. So, Miss Chang, it appears from the email 17:26  
5 that we went through that you were involved with 17:26  
6 [REDACTED] 17:26  
7 [REDACTED] 17:26  
8 the course of a couple of years. And based on your 17:26  
9 testimony today, it sounds like you have no 17:26  
10 recollection of any of those efforts, 17:26  
11 notwithstanding working on those matters for a 17:26  
12 couple of years. Can you explain that? 17:26  
13 A. So I wouldn't -- 17:26  
14 MR. FALCONER: Objection to form. 17:26  
15 THE WITNESS: So I wouldn't generalize it to 17:26  
16 that. So as you said, it's been over like -- it's 17:26  
17 been over eight years, so I don't remember that. 17:26  
18 I've worked on a lot of different projects, a lot of 17:26  
19 them blend together, so I don't remember this 17:27  
20 specifically. 17:27  
21 BY MR. LOESER: 17:27  
22 Q. Deprecating friends permissions was a pretty 17:27  
23 big deal for Facebook, wasn't it? 17:27  
24 A. I don't know. 17:27  
25 Q. At the keynote address of the F8 that 17:27

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1 year -- the F8 is a big deal, isn't it? 17:27

2 A. The event is. 17:27

3 Q. Yeah. And Mark Zuckerberg gave the keynote 17:27

4 address in 2014; right? 17:27

5 A. Like we saw, yes. 17:27

6 Q. And that's a big deal; right? 17:27

7 A. I -- I don't know if it was back then. 17:27

8 Q. Okay. And in his keynote address, one of 17:27

9 the things he talked about was deprecating friends 17:27

10 permissions; right? 17:27

11 A. I don't know if he used those words exactly, 17:27

12 but whatever the video said. 17:27

13 Q. Okay. What the video said is that Facebook 17:27

14 was going to stop sharing friends data; right? 17:27

15 A. If that's what the video said. I don't 17:27

16 remember it specifically. 17:27

17 Q. We just watched the video, Miss Chang. 17:27

18 A. Right, but I didn't memorize -- 17:27

19 MR. FALCONER: Objection. Argumentative. 17:28

20 BY MR. LOESER: 17:28

21 Q. Okay. So you can't remember what 17:28

22 Mr. Zuckerberg said in the video clip that we showed 17:28

23 you a couple hours ago? 17:28

24 A. Not exactly. 17:28

25 Q. Okay. And we went through the transcript -- 17:28

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1	right. I apologize.	17:29
2	BY MR. LOESER:	17:29
3	Q. If you look at that second highlighted	17:29
4	paragraph. Why don't you read that again,	17:29
5	Miss Chang.	17:30
6	A. "And in the past, when one of your	17:30
7	friend" --	17:30
8	Q. Go ahead. Sorry.	17:30
9	A. "And in the past, when one of your	17:30
10	friend blogged into an app, in this	17:30
11	case, Ilya, the app could ask him	17:30
12	not only to share his data, but also	17:30
13	data that his friends had shared	17:30
14	with him -- like photos and friend	17:30
15	lists here. So now we're going to	17:30
16	change this, and we're going to make	17:30
17	it so that now everyone has to choose	17:30
18	to share their own data with an app	17:30
19	themselves.	17:30
20	"So we think that this is a really	17:30
21	important step for giving people power	17:30
22	and control over how they share their	17:30
23	data with the apps. And as developers,	17:30
24	this is going to allow you to keep	17:31
25	building apps with all the same great	17:31

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1 social features while also giving 17:31  
2 people power and control first. So 17:31  
3 I am really happy that we're doing 17:31  
4 this." 17:31

5 Q. Now, I want to make sure that you understand 17:31  
6 what he said here because this is something that 17:31  
7 Mr. Zuckerberg included in his keynote address. And 17:31  
8 as he says, he was really happy they were doing 17:31  
9 this, and the "this" was eliminating friend sharing; 17:31  
10 right? Is that -- is that a description that you 17:31  
11 agree with? 17:31

12 A. No, I -- 17:31

13 MR. FALCONER: Object. Foundation. 17:31

14 THE WITNESS: No. I don't know if it's 17:31  
15 specifically related to that. I can't assume that. 17:31

16 BY MR. LOESER: 17:31

17 Q. Okay. Let's read a sentence and see if we 17:31  
18 can develop a common understanding. 17:31

19 "So now we're going to change this 17:31  
20 and we're going to make it so that 17:32  
21 now everyone has to choose their own 17:32  
22 data with a" -- I'm sorry, "That now 17:32  
23 everyone has to choose to share their 17:32  
24 own data with an app themselves." 17:32  
25 Do you understand what that means? 17:32

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1 A. Yes. 17:32

2 Q. What does that mean? 17:32

3 A. It means that people have to opt in to share 17:32

4 information. So if they publish something, they 17:32

5 have to opt in to do that. 17:32

6 Q. So that means that if one person downloads 17:32

7 an app, that app can't get access to that person's 17:32

8 friends, unless those friends also opt into that 17:32

9 sharing; is that right? 17:32

10 A. So I don't know specifically if it means to 17:32

11 that. 17:32

12 Q. Okay. So, Miss Chang, all that work you did 17:32

13 over at least a year period [REDACTED] 17:32

14 [REDACTED] 17:32

15 [REDACTED] are you telling the jury that you 17:32

16 don't have any understanding of what [REDACTED] 17:33

17 [REDACTED]? 17:33

18 MR. FALCONER: Objection. Form and 17:33

19 foundation. 17:33

20 THE WITNESS: So, again, I wasn't just 17:33

21 working on that. It would -- sounded like it was 17:33

22 working on a lot of different [REDACTED], so I 17:33

23 don't remember that specifically and how you're 17:33

24 positioning that. 17:33

25 / / / 17:33

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1 BY MR. LOESER: 17:33

2 Q. Do you remember at all when you were working 17:33

3 to [REDACTED] 17:33

4 [REDACTED] -- so stop there. 17:33

5 Do you remember that at all? 17:33

6 A. No, beyond what we were just reading earlier 17:33

7 today. 17:33

8 Q. Okay. And what we were reading earlier 17:33

9 today showed your involvement in [REDACTED] 17:33

10 [REDACTED]; right? 17:33

11 A. That's -- that's what the email -- if that's 17:33

12 what the email said, yeah. 17:33

13 Q. And so when Mr. Zuckerberg stood up and gave 17:33

14 this presentation and he touched on a topic on which 17:33

15 you had been working for over a year, you don't have 17:33

16 any recollection of noticing that? 17:33

17 A. I don't know if he's specifically referring 17:34

18 to what I am working on. 17:34

19 Q. Well, he was specifically referring to 17:34

20 getting rid of the ability of apps to access friend 17:34

21 permissions; right? 17:34

22 MR. FALCONER: Objection. Form and 17:34

23 foundation. 17:34

24 THE WITNESS: I don't believe that's what he 17:34

25 said. He said: 17:34

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1 "So now we're going to change this 17:34  
2 and we're going to make it so that 17:34  
3 everyone has to choose to share 17:34  
4 their own data with an app 17:34  
5 themselves." 17:34

6 BY MR. LOESER: 17:34

7 Q. So, Miss Chang, how do you think Facebook 17:34  
8 made that change? What do you think they did? 17:34

9 MR. FALCONER: Objection. Form. 17:34

10 THE WITNESS: They changed the permissioning 17:34  
11 model, I'm guessing. 17:34

12 BY MR. LOESER: 17:34

13 Q. Right. Doesn't that mean that they 17:34  
14 eliminated the friend sharing APIs? Isn't that what 17:34  
15 he's saying? 17:34

16 A. I don't -- 17:34

17 MR. FALCONER: Objection to form and 17:34  
18 foundation. 17:34

19 BY MR. LOESER: 17:34

20 Q. Right? 17:34

21 A. So, again, I don't know specifically because 17:34  
22 I think you're referring to one thing and I don't 17:35  
23 know. 17:35

24 Q. Okay. So looking at this language, you 17:35  
25 don't draw any line between making it so everyone 17:35

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1 has to choose to share their own data with an app 17:35  
2 themselves; you draw no connection in your mind 17:35  
3 between that and eliminating friend sharing? 17:35  
4 A. Again, I don't know what Mark is 17:35  
5 specifically referring to, so I can't make that 17:35  
6 assumption or connection. 17:35  
7 Q. And having gone through all these emails 17:35  
8 that we went through and looking at this language, 17:35  
9 you still can't make that connection? 17:35  
10 A. I can't. 17:35  
11 MR. FALCONER: Derek, we have been going a 17:35  
12 little more than an hour. Whenever you hit a 17:36  
13 stopping point, can we take a break? 17:36  
14 MR. LOESER: Now is fine. 17:36  
15 THE VIDEOGRAPHER: This marks the end of 17:36  
16 media No. 5 in the deposition of Jackie Chang. 17:36  
17 Going off the record. The time is 5:36. 17:36  
18 (Off the record.) 17:36  
19 THE VIDEOGRAPHER: This marks the beginning 17:56  
20 of media No. 6 in the deposition of Jackie Chang. 17:56  
21 We are back on the record. The time is 5:57. 17:57  
22 BY MR. LOESER: 17:57  
23 Q. Miss Chang, before we were talking about the 17:57  
24 2014 F8 Conference and I want to make sure I 17:57  
25 understand your testimony. Do you generally attend 17:57

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1 the F8 Conferences? 17:57

2 A. Not generally. I've been to them, but I 17:57

3 haven't been to all. 17:57

4 Q. And do -- you generally just don't have much 17:57

5 of a role there, so you can't remember much about 17:57

6 it? 17:57

7 A. That depends on which F8. I've spoken at F8 17:57

8 before. 17:57

9 Q. What are the topics on which you've spoken? 17:57

10 A. On Internet.org. 17:57

11 Q. Okay. And what year? Do you recall what 17:57

12 year that was? 17:57

13 A. I don't remember what year exactly. 17:57

14 MR. LOESER: We're going to show you the 17:57

15 next exhibit, which should be -- I know I'm going to 17:57

16 say it wrong, but I think it is Exhibit 24. 17:57

17 (Exhibit 24 marked for identification.) 17:58

18 BY MR. LOESER: 17:58

19 Q. Miss Chang, you should be looking at 17:58

20 Exhibit 24, which is an email from KP to Simon 17:58

21 Cross, and it's dated March 28th, 2014: Subject: 17:58

22 Re: Product Partnerships: Bi-Weekly Update." 17:58

23 Do you see that? 17:58

24 A. Yes. Can I read it? 17:58

25 Q. I'm just going to ask you just about one 17:58

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1 sentence. So why don't we go to that and then if 17:59  
2 you need more context to understand it, then, by all 17:59  
3 means, take your time, but... 17:59

4 A. Okay. 17:59

5 Q. So in this update -- if you move down this 17:59  
6 document, there's an update for "[REDACTED]." 17:59

7 Do you see that? 17:59

8 A. (Witness nods.) 17:59

9 Q. Then, it states "Platform" with two 17:59  
10 asterisks and in parentheses "(KP and Jackie)." [As 17:59  
11 read.]

12 And I read that to suggest that you were 17:59  
13 responsible for that information. 17:59

14 MR. FALCONER: Objection. Form. 17:59

15 THE WITNESS: Can I read this document 17:59  
16 first? 17:59

17 BY MR. LOESER: 17:59

18 Q. Yes, please. Well, that's the only -- 17:59  
19 that's the only section I want to ask you about, so 17:59  
20 if you want to just look at that, I will give you a 17:59  
21 second. We could speed this up. 17:59

22 A. Okay. 17:59

23 Q. But look -- go ahead and look and see what 17:59  
24 this -- what this email is and familiarize yourself 18:00  
25 with it. That's the only part I am going to be 18:00

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1 asking you about. 18:00

2 A. Yes, I see our names next to that. 18:00

3 Q. Okay. And so on the task that you're 18:00

4 assigned to here, or for which you appear to be 18:00

5 responsible with KP, the second bullet is: 18:00

6 "Planning [REDACTED] and 18:00

7 [REDACTED] 18:00

8 [REDACTED] 18:00

9 [REDACTED] 18:00

10 [REDACTED]. " 18:00

11 So it appears from this -- and if you look 18:00

12 at the top of the email, this is from 2014, that you 18:00

13 were specifically responsible for -- we can go back 18:01

14 to the section -- for [REDACTED] 18:01

15 [REDACTED]; is that right? 18:01

16 A. No. I wouldn't -- 18:01

17 MR. FALCONER: Objection. Form. 18:01

18 THE WITNESS: Again, I wouldn't classify 18:01

19 that as that. 18:01

20 BY MR. LOESER: 18:01

21 Q. Okay. Tell me how you would explain the 18:01

22 second bullet which says, "Planning [REDACTED] 18:01

23 [REDACTED] 18:01

24 [REDACTED] 18:01

25 [REDACTED]. " 18:01

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1                   What does that mean? 18:01

2                   MR. FALCONER: Objection. Form and 18:01

3 foundation. 18:01

4                   THE WITNESS: So I don't remember 18:01

5 specifically, which is why I wouldn't say I'm tasked 18:01

6 with it. Me and KP are assigned to it, so it could 18:01

7 be a lot of different folks contributing to it. So 18:01

8 I don't remember if that's specifically me or not. 18:01

9 BY MR. LOESER: 18:01

10                  Q. Okay. Well, your name is there; right? 18:02

11                  A. Along with KP, yes. 18:02

12                  Q. Okay. And there is a reference to "[REDACTED]" for 18:02

13 the -- [REDACTED]; right? Do you understand 18:02

14 that that's [REDACTED]? 18:02

15                  A. Correct. 18:02

16                  Q. And it references "[REDACTED]." 18:02

17 Do you recall being involved in [REDACTED] 18:02

18 [REDACTED]? 18:02

19                  A. Not specifically [REDACTED]. 18:02

20                  Q. And so looking at this, this does not 18:02

21 refresh your recollection, not one little bit, about 18:02

22 your role in connection with [REDACTED]? 18:02

23                  A. No. 18:02

24                  Q. So, Miss Chang, do you recall that there was 18:02

25 articles written about the fact that Facebook 18:02

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1 partners continued to have access to friends data 18:02  
2 after the implementation of Graph API version 2? 18:03  
3 A. No. I don't know what articles you're 18:03  
4 referencing to. 18:03  
5 MR. LOESER: Let's go to the next exhibit. 18:03  
6 (Exhibit 25 marked for identification.) 18:03  
7 BY MR. LOESER: 18:03  
8 Q. And this is Exhibit 25. Miss Chang, this is 18:03  
9 a New York Times article from December 16th of -- 18:03  
10 June 3rd, 2018. "Facebook Gave Device Makers Deep 18:04  
11 Access to Data on Users and Friends." 18:04  
12 Do you recall when this article came out? 18:04  
13 A. No. 18:04  
14 Q. And would it be your normal course to find 18:04  
15 out if an article was written about an area that 18:04  
16 concerned work that you did at Facebook? 18:04  
17 A. No. I think I would be reading articles for 18:04  
18 a very long time, so I don't focus a lot on 18:04  
19 articles. That would be our communications team. 18:04  
20 Q. Okay. So when this article -- and the 18:04  
21 subheading is: 18:04  
22 "The company formed data-sharing 18:04  
23 partnerships with Apple, Samsung and 18:04  
24 dozens of other device makers, 18:04  
25 raising new concerns about its privacy 18:04

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1           protections." 18:04

2           As we saw in the email, you were very 18:04

3 involved in the partnerships and the providing of 18:04

4 extended access to deprecated permissions. 18:04

5           But no one sent this to you and said, hey, 18:04

6 weren't you involved in this? 18:05

7           A. No. 18:05

8           MR. FALCONER: Objection. Form. 18:05

9 BY MR. LOESER: 18:05

10          Q. You've never read this article? 18:05

11          A. No. 18:05

12          Q. And you've never communicated with anyone 18:05

13 about the scandal that surfaced when people figured 18:05

14 out that this had happened? 18:05

15          A. So I don't -- I don't know. 18:05

16          Q. So now, it's not news to you that Facebook 18:05

17 reached data-sharing partnerships with at least 60 18:05

18 device makers; right? That was work you were doing 18:05

19 at Facebook, wasn't it? 18:05

20          A. No. Specifically, I didn't work in that -- 18:05

21 on devices. 18:05

22          Q. Okay. But we had -- as we went through, you 18:05

23 [REDACTED] 18:05

24 [REDACTED] 18:05

25 [REDACTED]. And having done that work, this was 18:05

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1 not an article that anyone brought to your 18:05  
2 attention? 18:05

3 A. I don't remember and, again, I didn't work 18:05  
4 on devices. 18:06

5 Q. So this is -- you're learning for the first 18:06  
6 time as we talk right now that there was a scandal 18:06  
7 regarding Facebook continuing to provide friends 18:06  
8 data to various partners? 18:06

9 A. Again, I don't remember. 18:06

10 Q. A front-page New York Times article was not 18:06  
11 something that came to your attention at Facebook? 18:06

12 A. There's been many, so I don't remember this 18:06  
13 specific one. 18:06

14 Q. The scandals are so many that the scandal 18:06  
15 with which you were personally involved doesn't 18:06  
16 stand out for you? 18:06

17 MR. FALCONER: Objection -- 18:06

18 THE WITNESS: I would not classify it that 18:06  
19 way. 18:06

20 MR. FALCONER: -- form, foundation and it 18:06  
21 misstates prior testimony. 18:06

22 BY MR. LOESER: 18:06

23 Q. I'm sorry. You can answer. 18:06

24 A. I would not state it the way you did. 18:06

25 MR. LOESER: All right. We can go to the 18:06

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1 next exhibit, 26. 18:06

2 (Exhibit 26 marked for identification.) 18:06

3 BY MR. LOESER: 18:07

4 Q. Miss Chang, we're showing you Exhibit 26, 18:07

5 which is an email from Charlotte Edelson to several 18:07

6 people, including yourself, dated August 28th, 2014: 18:07

7 Subject line, "Forward: [REDACTED]: 18:07

8 [REDACTED]." 18:07

9 Do you see that? 18:07

10 A. Sorry. Let me update. I see what you're 18:07

11 displaying. 18:08

12 Q. Do you know who Charlotte Edelson is? 18:08

13 A. No, I don't -- I don't remember. 18:08

14 Q. And do you know what "[REDACTED]" 18:08

15 are? 18:08

16 A. I don't know specifically. I just know that 18:08

17 it's likely [REDACTED]. 18:08

18 Q. [REDACTED]? 18:08

19 A. [REDACTED], but I don't know 18:08

20 specifically -- 18:08

21 Q. Okay.

22 A. -- [REDACTED]. 18:08

23 Q. All right. Let's go down the string a bit 18:08

24 to the August 13, 2014 email from Miss Edelson to, 18:08

25 among others, yourself. And you will see that 18:09

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1 Miss Edelson writes: 18:09

2 "Hi, As part of our team's [REDACTED] 18:09

3 [REDACTED] efforts, we would like 18:09

4 to [REDACTED] 18:09

5 [REDACTED]. 18:09

6 "Our hope is that by [REDACTED] 18:09

7 [REDACTED], we will be able to 18:09

8 [REDACTED], [REDACTED] 18:09

9 [REDACTED], [REDACTED] 18:09

10 [REDACTED] 18:09

11 [REDACTED]. 18:09

12 Additionally, ensuring [REDACTED] 18:09

13 [REDACTED] 18:09

14 [REDACTED] ([REDACTED] 18:09

15 [REDACTED] 18:09

16 [REDACTED])." 18:09

17 Do you recall this effort to [REDACTED] 18:09

18 [REDACTED]? 18:09

19 A. Not specifically. 18:09

20 Q. Do you remember anything at all about it? 18:09

21 A. Not -- not specifically. 18:09

22 Q. What about other than specifically? Do you 18:09

23 remember anything -- 18:10

24 A. I mean, I see the email, but I don't 18:10

25 remember this. 18:10

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1 Q. Okay. And this email doesn't refresh your 18:10  
2 recollection in any way about this subject matter? 18:10  
3 A. No. 18:10  
4 Q. Do you recall the effort to [REDACTED] 18:10  
5 [REDACTED]? 18:10  
6 A. I -- yes, I've heard it. 18:10  
7 Q. Okay. What does that refer to? 18:10  
8 A. I -- so I don't remember specifically like 18:10  
9 what year and in what reference. I know I've heard 18:10  
10 the term. 18:10  
11 Q. Okay. Well, this year for this email is 18:10  
12 2014, and the reference is to "[REDACTED] 18:10  
13 [REDACTED]." So can you describe what 18:10  
14 [REDACTED] -- or what the 18:10  
15 [REDACTED] that were mentioned 18:10  
16 in this email? 18:11  
17 A. No, I don't know. 18:11  
18 Q. Okay. In what context have you referred -- 18:11  
19 or heard the expression to "[REDACTED] 18:11  
20 [REDACTED]"? 18:11  
21 A. So I don't remember. I just know I heard 18:11  
22 the term. 18:11  
23 Q. Do you know what the term means? 18:11  
24 A. [REDACTED]. 18:11  
25 Q. And so what would be -- what needed to be 18:11

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1 [REDACTED]? 18:11

2 A. So almost anything can be [REDACTED] 18:11

3 [REDACTED] 18:11

4 [REDACTED] 18:11

5 [REDACTED]. It can be used in many ways. 18:11

6 Q. What are "[REDACTED]"? 18:11

7 A. I -- I don't know specifically. 18:11

8 Q. Do you have any notion of what [REDACTED] 18:11

9 [REDACTED] are? 18:11

10 A. [REDACTED], I would say, is like a 18:11

11 [REDACTED], as I mentioned. Again, like 18:12

12 a [REDACTED]. 18:12

13 Q. Okay. And is there something special about 18:12

14 [REDACTED] if it's the [REDACTED]? 18:12

15 A. I don't remember the criteria or what is 18:12

16 classified as [REDACTED]. 18:12

17 Q. And what do you think this means or refers 18:12

18 to "[REDACTED]" 18:12

19 [REDACTED]"? 18:12

20 A. I don't know. 18:12

21 Q. Okay. Did you respond to this email and 18:12

22 tell Miss Edelson that you had no idea what she's 18:12

23 talking about? 18:12

24 A. I don't know if I responded to her. I don't 18:12

25 even remember this email. 18:12

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1 Q. Do you have any understanding about [REDACTED] 18:12  
2 [REDACTED]? 18:12  
3 A. No, I don't know. 18:13  
4 Q. Doesn't this email explain to you how to [REDACTED] 18:13  
5 [REDACTED]? 18:13  
6 A. So this email is from [REDACTED] 18:13  
7 [REDACTED] team, which I'm not part of, so I don't 18:13  
8 know their processes. 18:13  
9 Q. Okay. Do you see that underline bolded 18:13  
10 thing that says, "What we need from YOU" and there's 18:13  
11 a big exclamation point? 18:13  
12 A. Yes. 18:13  
13 Q. Okay. This email was sent to you, so did 18:13  
14 you read that to mean that there was something that 18:13  
15 you needed to do? 18:13  
16 A. Well, it was sent to me amongst other 18:13  
17 people, so I don't know. There's a lot of emails 18:13  
18 that are sent to me that I never responded back to 18:13  
19 either. So I don't know. I don't remember 18:13  
20 specifically. 18:13  
21 Q. And in 2014, did you manage any apps? 18:13  
22 A. I think so. I'm not sure. 18:13  
23 Q. Okay. Well, that's a pretty good clue that 18:13  
24 the "you" might have been you, because the next line 18:14  
25 says: 18:14

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1 "As a first step, we are asking that 18:14  
2 you [REDACTED] 18:14  
3 [REDACTED]. " 18:14  
4 So do you recall ever [REDACTED] 18:14  
5 [REDACTED]? 18:14  
6 A. I don't. So again, it says "hi," dash, 18:14  
7 which is not even specific to anyone, so I don't 18:14  
8 read it as to me, Jackie. 18:14  
9 Q. Okay. The email ends and it says: 18:14  
10 "Don't hesitate to reach out if you 18:14  
11 have any questions or concerns about 18:14  
12 this process." 18:14  
13 And do you have any recollection of reaching 18:14  
14 out and expressing any questions or concerns about 18:14  
15 the process? 18:14  
16 A. I don't remember. 18:14  
17 Q. If you had [REDACTED] 18:14  
18 [REDACTED], is 18:14  
19 that something that would be saved somewhere at 18:14  
20 Facebook? 18:14  
21 A. Well, it says, I think, in the email to -- 18:14  
22 to use that document. 18:14  
23 Q. Okay. So if you clicked on that hyperlink, 18:15  
24 that would take you somewhere where you could store 18:15  
25 the document? 18:15

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1           A.     So I'm not storing the document, but it is     18:15  
2     through the Zoho service.     18:15

3           Q.     Okay. What's the "Zoho service"?     18:15

4           A.     It is a document service like Google Docs.     18:15

5           Q.     Okay. Let's look at No. 2, after the "What     18:15  
6     we need from you." It states:     18:15

7                     "Once you complete step 1, we will     18:15  
8                     [REDACTED]     18:15  
9                     [REDACTED]     18:15  
10                    [REDACTED]. "     18:15

11           So can you explain to me why [REDACTED]     18:15  
12     [REDACTED]     18:15  
13     [REDACTED]?     18:15

14           A.     Again, I don't know. I didn't write this     18:15  
15     email.     18:15

16           Q.     Do you recall the earlier presentation that     18:15  
17     we went through that noted that [REDACTED]     18:15  
18     [REDACTED] -- for     18:16  
19     [REDACTED]?     18:16

20           MR. FALCONER: Objection. Form.     18:16

21           THE WITNESS: Sorry, which -- which     18:16  
22     document?     18:16

23           BY MR. LOESER:     18:17

24           Q.     I would like to refer you back to     18:17  
25     Exhibit 12. If you look at the fourth page,     18:17

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1 " [REDACTED] ." The first bullet: 18:17

2 " [REDACTED] 18:18

3 [REDACTED] ([REDACTED] [REDACTED] 18:18

4 [REDACTED] )." 18:18

5 Do you recall a conversation about [REDACTED] 18:18

6 [REDACTED]

7 [REDACTED] ? 18:18

8 A. I don't remember. 18:18

9 MR. LOESER: We can go to the next exhibit, 18:18

10 which I believe is 27. 18:18

11 (Exhibit 27 marked for identification.) 18:19

12 MR. LOESER: We're uploading the exhibit, 18:19

13 but it's taking a minute. 18:19

14 BY MR. LOESER: 18:19

15 Q. Okay. We're showing you "Quip Business 18:19

16 Portal," dated June 13th, 2018. Are you familiar 18:19

17 with the Quip business portal and how it works? 18:19

18 A. I know Quip, the service. 18:19

19 Q. And we mentioned it previously, but tell me, 18:19

20 what is the Quip service? 18:19

21 A. It's a document-sharing service like Google 18:19

22 Docs. 18:19

23 Q. So it allows you to work with other people 18:19

24 on a document in real time? 18:20

25 A. Yes. 18:20

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1 Q. And is this something that you frequently 18:20  
2 use or not? 18:20

3 A. I've used it. I used it at whatever time 18:20  
4 the service was available just because we have a lot 18:20  
5 of rotating services. 18:20

6 Q. And is the -- is the service searchable? 18:20

7 A. Yes. 18:20

8 Q. How does that work? 18:20

9 A. There's a search header in the service and 18:20  
10 you can search for topics. 18:20

11 Q. Do you know when Facebook started using the 18:20  
12 Quip service? 18:20

13 A. I don't know exactly when. 18:20

14 Q. And is it something that's widely used at 18:20  
15 Facebook? 18:20

16 A. Not now. 18:20

17 Q. When was it widely used? 18:20

18 A. I don't remember the years, but there was a 18:20  
19 time where it was being used before us getting -- 18:21  
20 before Google Docs. 18:21

21 Q. And so it's something that Facebook stopped 18:21  
22 using? 18:21

23 A. Well, they're encouraging people to stop 18:21  
24 using it, but I think there are still documents 18:21  
25 there. 18:21

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1 Q. Okay. And what are people now using instead 18:21  
2 for the same type of functionality? 18:21

3 A. Google Docs. 18:21

4 Q. And do you use Google Docs now? 18:21

5 A. Yes. 18:21

6 Q. And when did you start using Google Docs? 18:21

7 A. I don't remember the year specifically. 18:21

8 Q. Now, somewhere in that enormous list of 18:21  
9 names, you are identified. So is it unusual to have 18:21  
10 so many people participating at the same time in the 18:22  
11 Quip service? 18:22

12 A. So I wouldn't call it "participating." 18:22  
13 People can just access it or read it. 18:22

14 Q. Okay.

15 A. It doesn't mean that you are participating 18:22  
16 in anything. 18:22

17 Q. So all those names on there are people that 18:22  
18 access this particular -- I don't want to call it 18:22  
19 conversation -- but work? 18:22

20 A. So I don't know enough about this service to 18:22  
21 tell you how to classify -- how people are 18:22  
22 referenced, so I don't know. 18:22

23 Q. If we can go to the fifth page of this 18:22  
24 document, to the -- I'm going to call it an "entry" 18:22  
25 because I have no idea what the terminology is, but 18:23

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1       there is a -- there's work by Suvrat Joshi. It 18:23  
2       says, "Edited May 28, 2017." 18:23  
3               Do you see that? 18:23  
4       A.     May -- May 29th, sorry, 2017? 18:23  
5       Q.     I think it is May 28th, but... 18:23  
6       A.     Oh. 18:23  
7       Q.     Yeah, look at the -- there we go. 18:23  
8       A.     Sorry. Oh, okay. Got it. 18:23  
9       Q.     So do you know who Suvrat Joshi is? 18:23  
10      A.     No. 18:23  
11      Q.     This outline he's creating, it says: 18:23  
12             "1. [REDACTED] 18:23  
13             [REDACTED], 18:24  
14             [REDACTED]. 18:24  
15             "a. Use Case/Problem to solve: 18:24  
16             "i. [REDACTED]..." 18:24  
17             Do you recall there being a problem with 18:24  
18             [REDACTED]? 18:24  
19             MR. FALCONER: Objection to form. 18:24  
20             THE WITNESS: No. And I think how he is 18:24  
21             referencing it here is "problem to solve," not -- I 18:24  
22             think you're trying to infer it differently. 18:24  
23             BY MR. LOESER: 18:24  
24             Q.     Okay. Well, I'm just reading it. But "Use 18:24  
25             Case/Problem to solve" and Roman numeral i is 18:24

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1 " [REDACTED] ." 18:24

2 What was your job at this time with regard 18:24

3 to partners? 18:24

4 A. 2017, sorry. Sorry. I almost would need a 18:24

5 refresh of my LinkedIn. [Counting to self]. 18:24

6 I think I was working on Internet.org. 18:25

7 Q. 2017 -- I can't tell from your LinkedIn, but 18:25

8 2007 through September 2019, it says "Head of

9 business partner business platform partnerships."

10 DEPOSITION REPORTER: Can you repeat that

11 again?

12 BY MR. LOESER:

13 Q. It looks like in 2017, you started with 18:25

14 Internet.org and then you transitioned to head of 18:25

15 business platform partnerships.

16 Do you know when in the year you 18:25

17 transitioned to head of business platform 18:25

18 partnerships? 18:25

19 A. So I don't know the specific dates, and I 18:25

20 didn't come in as head of business partnership. I 18:25

21 was a partner manager and then eventually left the 18:25

22 role as head. 18:26

23 Q. Let's move down a little bit farther to the 18:26

24 1:13 p.m. work by Suvrat Joshi, at the bottom of the 18:26

25 page we are looking at. 18:26

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1 A. Okay. 18:26

2 Q. So it says: 18:26

3 " [REDACTED] 18:26

4 [REDACTED] 18:26

5 [REDACTED]. " 18:26

6 And then below that it says: 18:26

7 "a. Use," "b" is edited, and "c" is 18:26

8 "Case/Problem to solve." And this states: 18:26

9 " [REDACTED] 18:26

10 [REDACTED] 18:26

11 [REDACTED]. 18:26

12 "ii. [REDACTED] 18:26

13 [REDACTED] 18:26

14 [REDACTED]. 18:26

15 "iii. [REDACTED] 18:26

16 [REDACTED] 18:26

17 [REDACTED]. 18:26

18 "iv. [REDACTED] 18:27

19 [REDACTED] 18:27

20 [REDACTED]. " 18:27

21 And was this ever something, this problem 18:27

22 with [REDACTED], something that was raised with you? 18:27

23 A. So, again, I don't believe it's a problem. 18:27

24 It says "problem to solve." Doesn't mean that it's 18:27

25 an actual problem, but I don't -- so I don't know 18:27

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1     what the -- I have not seen this document, I don't     18:27  
2     believe.     18:27

3           Q.     Okay.   So would you agree with me that where 18:27  
4     this says, "[REDACTED]"     18:27  
5     [REDACTED]     18:27  
6     [REDACTED], " that that would be a problem for     18:27  
7     Facebook?     18:27

8           A.     So, again, I don't know how to infer what     18:27  
9     Suvrat Joshi was meaning when he wrote that.     18:27

10          Q.     Do you know what a "profile" is?   How     18:27  
11     does Facebook -- I'm sorry.     18:28

12                  How does Facebook use the term "profile"?     18:28

13          A.     So it can mean different things.   There     18:28  
14     could be a Facebook profile on the Facebook service.     18:28  
15     You could have a profile through your internal     18:28  
16     tools.   You could also have like, you know, a     18:28  
17     profile in enterprise software.   So I don't know     18:28  
18     what specifically is being referenced.     18:28

19          Q.     So just to clarify the record, we've looked 18:28  
20     through the list of names and we can't actually find 18:28  
21     your name on that, but... so I just want to make the 18:28  
22     record clear on that.     18:28

23                  But nonetheless, in your role with partners, 18:28  
24     this is not a problem that was ever something that     18:28  
25     you evaluated?     18:28

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1 DEPOSITION REPORTER: I'm sorry. I lost the  
2 tail on that. "That you..."

3 MR. LOESER: Evaluated. 18:28

4 THE WITNESS: So, again, I -- I feel like 18:28  
5 it's kind of generalized, so I don't -- I don't 18:28  
6 know. I have not seen this, so no. 18:28

7 MR. LOESER: Okay. We can move on. 18:29

8 Exhibit 28 is an email that will materialize 18:29  
9 momentarily. 18:29

10 (Exhibit 28 marked for identification.) 18:29

11 BY MR. LOESER: 18:29

12 Q. So, Miss Chang, we are showing you an email 18:29  
13 dated October 16th, 2019, that appears like it was 18:29  
14 sent to yourself, sent from you to you and also to 18:29  
15 Joel Yawili, that includes a chat message. 18:29

16 Who is Joel Yawili? 18:30

17 A. Joel. 18:30

18 Q. Joel. 18:30

19 A. He was someone on the team and reported to 18:30  
20 me at some point in time. I don't remember the 18:30  
21 exact period of time. 18:30

22 Q. Okay. This chat says, "Hi Jackie, re: [REDACTED] 18:30

23 [REDACTED]. " 18:30

24 What is that "[REDACTED]"? 18:30

25 A. [REDACTED]. 18:30

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1 Q. What does that mean? 18:30

2 A. [REDACTED] -- so I don't know the 18:30

3 specific acronym. 18:30

4 Q. Whatever it is, it is severe? 18:30

5 A. It's an -- it's an issue, like if something 18:30

6 breaks. 18:30

7 Q. Okay. And take a minute to look at the 18:30

8 chat, and then you can tell me what it is that broke 18:30

9 that is being discussed here. 18:31

10 A. Okay. 18:32

11 Q. Okay. So do you have an understanding of 18:32

12 what the "[REDACTED]" discussed in this chat is? 18:32

13 A. I don't know it in specific details, but I 18:32

14 can glean from the TLDR section. 18:32

15 Q. Okay. What have you gleaned? 18:32

16 A. It says that when -- or sorry, we then -- or 18:32

17 sorry -- April 2018, we announced that [REDACTED] 18:32

18 [REDACTED]. We then 18:32

19 [REDACTED] 18:32

20 [REDACTED]. [REDACTED] 18:32

21 [REDACTED]. This week we 18:32

22 found out that, unfortunately, [REDACTED] 18:32

23 [REDACTED] 18:32

24 [REDACTED]. " 18:32

25 Q. Okay. And do you know what the "[REDACTED]" 18:32

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1 is? 18:32

2 A. Not the -- I don't -- I don't know enough to 18:33

3 know what it does exactly. 18:33

4 Q. Okay. If you look up the chat a bit, at one 18:33

5 point, you state: 18:33

6 "I don't need to be on the thread but 18:33

7 would love a TLDR to better understand 18:33

8 the issue." 18:33

9 What does that mean? 18:33

10 A. I just wanted to get an understanding of 18:33

11 what exactly the issue was, since I think at that 18:33

12 time, I was just starting to, I guess, jump back in 18:33

13 to some of the platform stuff, so I didn't have full 18:33

14 context on a lot of things. 18:33

15 Q. Okay. And do you recall getting a better 18:33

16 understanding of this issue? 18:33

17 A. I don't think so because I -- I mean, what I 18:33

18 said is probably just to point him to KP, since KP 18:33

19 was working on it, and I figured he would have more 18:33

20 historical context. 18:33

21 Q. What does "[REDACTED]" 18:33

22 "[REDACTED]" mean? 18:34

23 A. I don't know. 18:34

24 Q. And "GK" is gatekeeper, you testified 18:34

25 earlier; right? 18:34

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1 A. Yes. 18:34

2 Q. And so you don't have any understanding of 18:34

3 what it means [REDACTED] 18:34

4 [REDACTED]? 18:34

5 A. Correct. I'm not the engineer who does it, 18:34

6 so I don't know what it exactly means or entails. 18:34

7 Q. Okay. And what you read at the bottom of 18:34

8 that chat was: 18:34

9 "We then created [REDACTED] 18:34

10 [REDACTED] 18:34

11 [REDACTED]...This 18:34

12 week we found out that unfortunately 18:34

13 [REDACTED] 18:34

14 [REDACTED] 18:34

15 [REDACTED]."

16 So do you have any idea of how this problem 18:35

17 was solved? 18:35

18 A. I don't specifically. 18:35

19 Q. So who would be responsible for 18:35

20 [REDACTED] 18:35

21 [REDACTED]? 18:35

22 A. So I don't know specifically, but I would go 18:35

23 to an engineer. But I don't know specific to this 18:35

24 case. 18:35

25 Q. Miss Chang, what do you know about the 18:35

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1 Cambridge Analytica scandal on Facebook? 18:35

2 A. What I know is what I've read, which is 18:36

3 dealing with like a researcher taking the 18:36

4 information and selling it to, I believe, a 18:36

5 Cambridge Analytica, which is a political agency. 18:36

6 Q. And the researcher was Aleksandr Kogan; is 18:36

7 that right? 18:36

8 A. I believe that's his name. 18:36

9 Q. And the problem started with an app that 18:36

10 obtained a whole lot of friends data; is that right? 18:36

11 A. So I don't know the specifics of it. 18:36

12 Q. And how many articles would you say you've 18:36

13 read about the Cambridge Analytica scandal? 18:36

14 A. I don't know. 18:36

15 Q. Have there been any briefings internal to 18:36

16 Facebook that you attended to which the Cambridge 18:37

17 Analytica scandal was discussed? 18:37

18 A. I don't recall. 18:37

19 Q. Do you recall whether it was -- that was a 18:37

20 significant event at Facebook? 18:37

21 A. Yes. 18:37

22 Q. And did you ever cross paths with Aleksandr 18:37

23 Kogan or Cambridge Analytica in your work with 18:37

24 partners or researchers? 18:37

25 A. Sorry, like him physically or... 18:37

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1 Q. No, just in your work. Or the partners or 18:37  
2 was that a researcher that you ever interacted with 18:37  
3 in your job at Facebook? 18:37

4 A. No. 18:37

5 Q. Are you --

6 A. I did not interact with him. Sorry. 18:37

7 Q. I'm sorry. Go ahead. 18:37

8 A. Oh, I said, I did not interact with him. 18:37

9 Q. Have you ever worked with political 18:37  
10 advertisers? 18:37

11 A. Not to my knowledge. 18:37

12 Q. Are you aware that Facebook worked with 18:37  
13 Cambridge Analytica during the 2016 Presidential 18:38  
14 campaign? 18:38

15 A. So I don't know the details enough to -- I 18:38  
16 don't know. 18:38

17 Q. That's not something that you were 18:38  
18 particularly interested in learning about? 18:38

19 A. No. 18:38

20 Q. Now, you understand that the Cambridge 18:38  
21 Analytica scandal had to do with the ability of an 18:38  
22 app to obtain content information about the app 18:38  
23 user's friends; right? 18:38

24 A. So, again, I don't know the details enough 18:38  
25 where I would say I know that. 18:38

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1 Q. So that's not something that you've gleaned 18:38  
2 from the pending article you have read about the 18:38  
3 Cambridge Analytica scandal? 18:39

4 A. I don't feel comfortable making that 18:39  
5 assumption, so I don't know. I don't remember those 18:39  
6 words exactly or anything. 18:39

7 Q. Okay. Did you read that it started with a 18:39  
8 This is a Your Digital Life app that a hundred and 18:39  
9 something thousand people downloaded, and from that, 18:39  
10 content information was obtained for 87 million 18:39  
11 Facebook users? 18:39

12 A. I don't know that specifically. 18:39

13 Q. Is that generally your understanding of what 18:39  
14 happened? 18:39

15 A. Not to that specificity, but so like I said 18:39  
16 earlier, the information that he sold. 18:39

17 Q. Okay. But is it your general understanding 18:39  
18 that a relatively small number of people used an 18:39  
19 app, and from that app, a very large number of 18:39  
20 people ended up having their information obtained by 18:39  
21 that app? 18:39

22 A. So, again, I -- I don't know specifically. 18:39

23 Q. I'm not asking you specifically. I'm just 18:40  
24 asking just for the very most basic of your 18:40  
25 understanding of the problem. 18:40

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1 And do you have any understanding that a 18:40  
2 small number or relatively small number of app users 18:40  
3 caused a relatively large number of Facebook users 18:40  
4 to share their information with the app? 18:40

5 A. So as you said, it's all relative, which is 18:40  
6 why I don't feel comfortable making assertions on 18:40  
7 how relative it is because I don't know in detail to 18:40  
8 make that assumption. 18:40

9 Q. So you're saying that you can't testify to 18:40  
10 any degree or in any way about whether the This is 18:40  
11 Your Digital Life app was downloaded by a relatively 18:40  
12 small number of people and, because of that, a whole 18:40  
13 lot of people had their information shared with the 18:40  
14 app who did not download the app? That's not 18:40  
15 something that kind of jumped out at you from 18:40  
16 reading anything about this scandal? 18:40

17 MR. FALCONER: Objection. Asked and 18:40  
18 answered. 18:40

19 THE WITNESS: So those are your words and I 18:40  
20 don't know if that's what was stated. I don't know 18:40  
21 in specificity where I would stand behind that, 18:41  
22 especially if I'm supposed to testify to what I 18:41  
23 know. So I don't know that specifically. 18:41

24 BY MR. LOESER: 18:41

25 Q. And do you understand that it was friends 18:41

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1 permissions that are at the heart of the ability of 18:41  
2 the This is Your Digital Life app to obtain content 18:41  
3 information for so many Facebook users? 18:41

4 A. So I don't know. 18:41

5 Q. Okay. And that's not something that you 18:41  
6 thought you should look into, notwithstanding all 18:41  
7 the work you did with [REDACTED] 18:41  
8 [REDACTED]? 18:41

9 A. So I didn't work on that specifically and 18:41  
10 that's not my job [REDACTED]. 18:41

11 Q. You did a lot of work on [REDACTED] 18:41  
12 [REDACTED] 18:41  
13 [REDACTED]; right? 18:41

14 A. So I [REDACTED] but I think you were implying [REDACTED] 18:41  
15 [REDACTED], which I was not. 18:41

16 Q. Okay. You say you "[REDACTED]." But you 18:41  
17 [REDACTED], you dealt with [REDACTED], you 18:42  
18 did a lot of work to figure out how Facebook should 18:42  
19 [REDACTED] 18:42  
20 [REDACTED]; right? 18:42

21 A. I did it within that context, but I think 18:42  
22 what you're inferring is that, and I did not work on 18:42  
23 that Cambridge Analytica. 18:42

24 Q. I understand you didn't work on Cambridge 18:42  
25 Analytica. I'm just trying to understand your 18:42

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1 reaction to Cambridge Analytica. Cambridge 18:42  
2 Analytica had to do with friends sharing and friends 18:42  
3 permissions, and you did an extraordinary amount of 18:42  
4 work, as your emails show, [REDACTED] 18:42  
5 [REDACTED] 18:42  
6 [REDACTED].

7 So is that true that you did, in fact, work 18:42  
8 on [REDACTED] 18:42  
9 [REDACTED]? 18:42

10 MR. FALCONER: Objection to form. 18:42

11 THE WITNESS: So I think you are connecting 18:42  
12 the two, and I don't know enough to make that 18:42  
13 assertion. And I wouldn't position it as that, as 18:42  
14 how you are framing it. 18:43

15 BY MR. LOESER: 18:43

16 Q. Okay. So after the Cambridge Analytica 18:43  
17 scandal broke and there were articles written about 18:43  
18 how it was through friends permissions that 18:43  
19 Cambridge Analytica got so much information, you 18:43  
20 never went back and thought to yourself, you know, I 18:43  
21 have been doing all this work on [REDACTED] 18:43  
22 [REDACTED], maybe I should revisit this 18:43  
23 subject? 18:43

24 MR. FALCONER: Objection. Form. 18:43

25 THE WITNESS: No. I -- I was not focused on 18:43

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1 Cambridge Analytica to do any exploration around it. 18:43

2 MR. LOESER: We can go to Exhibit 29. 18:43

3 (Exhibit 29 marked for identification.) 18:43

4 BY MR. LOESER: 18:44

5 Q. Miss Chang, Exhibit 29 is an email from 18:44

6 Jackie Rooney, dated March 22nd, 2018, to the mteam. 18:44

7 What is the "mteam"? 18:44

8 A. I don't know the exact definition, but it's 18:44

9 the leadership group. 18:44

10 Q. Okay. Are you in that group? 18:44

11 A. No. 18:44

12 Q. Okay. And "[REDACTED]," do you know 18:44

13 what that is? 18:44

14 A. No. 18:44

15 Q. This subject is, "Q & A Briefing for March 18:44

16 23, 2018." 18:44

17 Is this the kind of briefing that you would 18:44

18 attend or that you would listen to? How are these Q 18:45

19 and A briefings handled? 18:45

20 A. So I don't know. I don't attend all of 18:45

21 them. 18:45

22 Q. Do you attend any of them? 18:45

23 A. Probably a couple. 18:45

24 Q. And why don't you spend a minute to look 18:45

25 through this one, and you can tell me if you 18:45

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1 attended this one. 18:45

2 A. I don't know. 18:45

3 Q. Why don't we go to the very last page of 18:45

4 that briefing. It says at the top of the page, 18:45

5 "Cheryl will tell her 10-year" -- I don't know how 18:46

6 to say that -- "Faceversary story from MPK." 18:46

7 And then it says, "11 years Jackie Chang." 18:46

8 So it appears they were going to celebrate 18:46

9 your 11 years at Facebook? 18:46

10 A. Yes. 18:46

11 Q. Do you recall anyone congratulating you in a 18:46

12 briefing on your 11 years at Facebook? 18:46

13 A. I mean, I don't know that one specifically. 18:46

14 They tend you call you out every Faceversary, so I 18:46

15 don't know if this specific one. 18:46

16 Q. Okay. Let's go to the first page. March 18:46

17 22nd, 2018, this is obviously right on the heels of 18:46

18 the Cambridge Analytica scandal. And the first -- 18:46

19 second heading down at the bottom of the page is 18:46

20 "[REDACTED]." 18:46

21 "What is the message [REDACTED] 18:46

22 [REDACTED] 18:47

23 [REDACTED] 18:47

24 [REDACTED]?" 18:47

25 Could you read the third bullet. 18:47

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1 A. "[REDACTED] 18:47  
2 [REDACTED] 18:47  
3 [REDACTED]. [REDACTED] 18:47  
4 [REDACTED] 18:47  
5 [REDACTED]." 18:47  
6 Q. Now, this reference to [REDACTED] 18:47  
7 "[REDACTED]," 18:47  
8 does that appear to you to be the reference to the 18:47  
9 [REDACTED], including 18:47  
10 [REDACTED], [REDACTED] 18:47  
11 [REDACTED]? 18:47  
12 MR. FALCONER: Objection. Form. 18:47  
13 THE WITNESS: I don't know specifically if 18:47  
14 it's referencing that. It could be referencing a 18:47  
15 lot of different initiatives. 18:47  
16 BY MR. LOESER: 18:47  
17 Q. Can you think of any other initiative, other 18:47  
18 than the one that we just spent hours going through, 18:47  
19 that related to [REDACTED]? 18:47  
20 MR. FALCONER: Objection. Form. 18:48  
21 THE WITNESS: So I don't know what the 18:48  
22 product teams and engineering teams would do in 18:48  
23 detail. I don't track every single thing. 18:48  
24 BY MR. LOESER: 18:48  
25 Q. But as a Facebook employee working in 18:48

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1 partners, working on [REDACTED] 18:48  
2 [REDACTED], you're certainly aware that [REDACTED] 18:48  
3 [REDACTED] 18:48  
4 [REDACTED]; right? 18:48  
5 A. I don't know specifically if that's what 18:48  
6 it's communicating in this email. 18:48  
7 Q. Now, this says, "[REDACTED]." 18:48  
8 Do you know what [REDACTED] this bullet is 18:48  
9 referring to in connection with [REDACTED] 18:48  
10 [REDACTED]? 18:48  
11 MR. FALCONER: Objection. Form and 18:48  
12 foundation. 18:48  
13 THE WITNESS: I don't know what [REDACTED] 18:48  
14 [REDACTED] it's referring to. 18:48  
15 BY MR. LOESER: 18:48  
16 Q. And this says: 18:48  
17 "[REDACTED] 18:49  
18 [REDACTED] 18:49  
19 [REDACTED]." 18:49  
20 Now, is that a reference to [REDACTED] 18:49  
21 [REDACTED] 18:49  
22 [REDACTED]? 18:49  
23 MR. FALCONER: Same objections. 18:49  
24 THE WITNESS: Again, I don't know to make 18:49  
25 that conclusion. I don't -- I don't know if that's 18:49

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1 the intention of whoever wrote this. 18:49

2 BY MR. LOESER: 18:49

3 Q. So this is a blank slate for you as well 18:49

4 then, whether -- whether [REDACTED] 18:49

5 [REDACTED] 18:49

6 [REDACTED]? 18:49

7 A. In the context of making assumptions of what 18:49

8 I know, the person who wrote this, I don't know. 18:49

9 Q. And you don't recall any briefing in which 18:49

10 anyone at Facebook talked about [REDACTED] 18:49

11 [REDACTED] 18:49

12 [REDACTED]? 18:49

13 A. So, again, I don't remember specifically. 18:50

14 Q. Now, Miss Chang, you're certainly aware that 18:50

15 [REDACTED] 18:50

16 [REDACTED]

17 [REDACTED]; right?

18 DEPOSITION REPORTER: I'm sorry. Excuse me.

19 I need that question again.

20 "Now, Miss Chang, you're certainly aware 18:50

21 [REDACTED]..." 18:50

22 MR. LOESER: [REDACTED] 18:50

23 [REDACTED]. 18:50

24 THE WITNESS: To what that email said, 18:50

25 whatever we were looking in the past. 18:50

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1 BY MR. LOESER: 18:50

2 Q. So that's yes, you're aware that [REDACTED] 18:50

3 [REDACTED] 18:50

4 [REDACTED], 18:50

5 specifically -- 18:50

6 A. I wasn't -- I wasn't aware personally as I 18:50

7 don't remember, but I've read the emails you've been 18:51

8 sharing. 18:51

9 Q. And you see that that, in fact, happened; 18:51

10 correct? 18:51

11 MR. FALCONER: Objection. Form and 18:51

12 foundation. 18:51

13 THE WITNESS: I don't know. I don't know 18:51

14 what happened after. 18:51

15 BY MR. LOESER: 18:51

16 Q. Miss Chang, please tell the jury what you 18:51

17 did to make sure that Facebook users were notified 18:51

18 that [REDACTED], [REDACTED] 18:51

19 [REDACTED] 18:51

20 [REDACTED]. 18:51

21 MR. FALCONER: Objection. Form and 18:51

22 foundation. 18:51

23 THE WITNESS: So, again, I don't know. 18:51

24 BY MR. LOESER: 18:51

25 Q. You don't know what you did to inform users 18:51

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1 of the -- that [REDACTED] 18:51  
2 [REDACTED]? 18:51  
3 A. Yes, I don't know. I think you're -- I 18:51  
4 think the question is very broad, so I don't know 18:51  
5 what you're inferring. 18:51  
6 Q. Miss Chang, did you do anything at all to 18:52  
7 make sure that Facebook users were notified that 18:52  
8 [REDACTED], [REDACTED] 18:52  
9 [REDACTED] 18:52  
10 [REDACTED]? 18:52  
11 MR. FALCONER: Same objections. 18:52  
12 THE WITNESS: So I don't think I personally 18:52  
13 did anything. I don't know. 18:52  
14 BY MR. LOESER: 18:52  
15 Q. You either did something or you didn't. 18:52  
16 A. Or I don't know. 18:52  
17 Q. How could you not know whether you did 18:52  
18 something or not? 18:52  
19 MR. FALCONER: Objection. Argumentative. 18:52  
20 THE WITNESS: Because I don't remember. 18:52  
21 BY MR. LOESER: 18:52  
22 Q. Okay. So are you saying to the jury that 18:52  
23 you might have done something to inform Facebook 18:52  
24 users that [REDACTED], 18:52  
25 [REDACTED] 18:52

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1 [REDACTED]? 18:52

2 A. No. 18:52

3 MR. FALCONER: Objection. Form. Asked and 18:52

4 answered. 18:52

5 THE WITNESS: No. I'm saying I don't 18:52

6 remember. 18:52

7 BY MR. LOESER: 18:52

8 Q. Isn't it a fact, Miss Chang, that you did 18:52

9 not do anything to inform Facebook users that [REDACTED] 18:52

10 [REDACTED] 18:53

11 [REDACTED] 18:53

12 [REDACTED]? 18:53

13 MR. FALCONER: Objection. Form. Objection. 18:53

14 Asked and answered. 18:53

15 THE WITNESS: Again, I don't remember. 18:53

16 MR. LOESER: Why don't we take a 10-minute 18:53

17 break. We'll go through -- 18:53

18 MR. FALCONER: Can we make it 5? I know 18:53

19 Miss Chang has some obligations she needs to attend 18:53

20 to this evening, so the quicker we can finish up, 18:53

21 the better. 18:53

22 MR. LOESER: Sure. That's fine. 18:53

23 THE VIDEOGRAPHER: This marks the end of 18:53

24 media No. 6 in the deposition of Jackie Chang. Off 18:53

25 the record. The time is 6:53. 18:53

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1 (Off the record.) 18:53

2 THE VIDEOGRAPHER: This marks the beginning 18:59

3 of media No. 7 in the deposition of Jackie Chang. 18:59

4 Back on the record. The time is 6:59. 18:59

5 MR. LOESER: Miss Chang, I have no further 18:59

6 questions for you at this time. However, I will 18:59

7 note for the record that we are evaluating the 18:59

8 transcript and the testimony in light of Special 19:00

9 Master Garrie's comments, and we will communicate 19:00

10 with your counsel as to whether we intend to recall 19:00

11 you. 19:00

12 And with that, I know you have something 19:00

13 else to do for tonight so we can close for the 19:00

14 evening. 19:00

15 MR. FALCONER: Yeah, I mean, if there are 19:00

16 other questions, I think Miss Chang is available to 19:00

17 answer them now. 19:00

18 MR. LOESER: Well, Counsel, a couple minutes 19:00

19 ago, you told me that she needed to leave so I was 19:00

20 trying to do her the courtesy of allowing that to 19:00

21 happen. 19:00

22 If we have other questions, it would be 19:00

23 based upon our review of the testimony and the 19:00

24 discussion of certain exhibits, so it will take us a 19:00

25 bit to sort that out. And I don't want to make a 19:00

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1 rash decision, so we will just reserve our rights 19:00  
2 under that and with regard to Special Master 19:00  
3 Garrie's comments and get back to you. 19:00

4 MR. FALCONER: Sure. And we will reserve 19:00  
5 all rights as well. I can't remember what the 19:00  
6 protocol says about whether we need to say we are 19:00  
7 going to read and sign, so I will state it, we will 19:01  
8 read and sign, and we will reserve questions. 19:01

9 MR. LOESER: Okay. Thank you, Miss Chang, I 19:01  
10 appreciate your time today. And, Russ, I appreciate 19:01  
11 your involvement as well. It is a good start to a 19:01  
12 lot of depositions that will be taken in terms of 19:01  
13 the counsel communicating clearly and effectively 19:01  
14 without wasting a lot of time on the record, so I 19:01  
15 really appreciate that. 19:01

16 THE VIDEOGRAPHER: Is there anything else we 19:01  
17 need on the record before I close out? 19:01

18 DEPOSITION REPORTER: Counsel, I need 19:01  
19 orders. I know Gibson Dunn has a three-day expedite  
20 and a rough. What is your order?

21 MS. WEAVER: We'd like the same.

22 DEPOSITION REPORTER: Thank you. Who was  
23 it that said that? I'm sorry.

24 MS. WEAVER: It's God. No, it's Lesley  
25 Weaver, and I apologize.

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1 DEPOSITION REPORTER: Thank you. I'm 19:01

2 ready. 19:01

3 THE VIDEOGRAPHER: Okay. We are off the 19:01

4 record at 7:01 p.m. and this concludes today's 19:01

5 testimony given by Jackie Chang. The total number 19:01

6 of media units used was seven and will be retained 19:01

7 by Veritext Legal Solutions. 19:02

8 (Off the record.) 19:02

9 DEPOSITION REPORTER: We're back on the 19:02

10 record. 19:02

11 MR. FALCONER: Facebook requests a 19:02

12 provisional confidentiality designation for the 19:02

13 transcript from today. 19:02

14 MR. LOESER: Understood. 19:02

15 (Ending time: 7:02 p.m.)

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1  
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4  
5 I, Jackie Chang, do hereby declare under  
6 penalty of perjury that I have read the foregoing  
7 transcript; that I have made corrections as appear  
8 noted, in ink, initialed by me, or attached hereto; that  
9 my testimony as contained herein, as corrected, is true  
10 and correct.

11 EXECUTED this \_\_\_\_ day of \_\_\_\_\_,  
12 2021, at \_\_\_\_\_, - \_\_\_\_\_.  
13 (City) (State)

14  
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17 Jackie Chang  
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1 I, JANIS JENNINGS, CSR No. 3942, Certified  
2 Shorthand Reporter, certify:

3 That the foregoing proceedings were taken  
4 before me at the time and place therein set forth, at  
5 which time the witness was duly sworn by me;

6 That the testimony of the witness, the  
7 questions propounded, and all objections and statements  
8 made at the time of the examination were recorded  
9 stenographically by me and were thereafter transcribed;

10 That the foregoing pages contain a full, true  
11 and accurate record of all proceedings and testimony.

12 Pursuant to F.R.C.P. 30(e)(2) before  
13 completion of the proceedings, review of the transcript  
14 [X] was [ ] was not requested.

15 I further certify that I am not a relative or  
16 employee of any attorney of the parties, nor financially  
17 interested in the action.

18 I declare under penalty of perjury under the  
19 laws of California that the foregoing is true and  
20 correct.

21 Dated: 12/21/2021

22   
23

24 JANIS JENNINGS, CSR NO. 3942

25 CLR, CCRR

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RUSSELL H. FALCONER, ESQ.

rfalconer@gibsondunn.com

December 21, 2021

RE: IN RE: FACEBOOK, INC. CONSUMER

PRIVACY USER PROFILE LITIGATION

12/16/2021, JACKIE CHANG, JOB NO. 49769494

The above-referenced transcript has been

completed by Veritext Legal Solutions and

review of the transcript is being handled as follows:

\_\_\_ Per CA State Code (CCP 2025.520 (a)-(e)) - Contact Veritext to schedule a time to review the original transcript at a Veritext office.

\_\_\_ Per CA State Code (CCP 2025.520 (a)-(e)) - Locked .PDF Transcript - The witness should review the transcript and make any necessary corrections on the errata pages included below, notating the page and line number of the corrections. The witness should then sign and date the errata and penalty of perjury pages and return the completed pages to all appearing counsel within the period of time determined at the deposition or provided by the Code of Civil Procedure.

\_\_\_ Waiving the CA Code of Civil Procedure per Stipulation of Counsel - Original transcript to be released for signature as determined at the deposition.

\_\_\_ Signature Waived - Reading & Signature was waived at the time of the deposition.

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1    \_X\_ Federal R&S Requested (FRCP 30(e)(1)(B)) - Locked .PDF

2           Transcript - The witness should review the transcript and  
3           make any necessary corrections on the errata pages included  
4           below, notating the page and line number of the corrections.  
5           The witness should then sign and date the errata and penalty  
6           of perjury pages and return the completed pages to all  
7           appearing counsel within the period of time determined at  
8           the deposition or provided by the Federal Rules.

9    \_\_ Federal R&S Not Requested - Reading & Signature was not  
10           requested before the completion of the deposition.

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IN RE: FACEBOOK, INC. CONSUMER PRIVACY USER PROFILE LITIGATION  
JACKIE CHANG (JOB NO. 4976949)

## E R R A T A S H E E T

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WITNESS

Date

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[best - cambridge]

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[third - transitioning]

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**[updating - videographer]**

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[videographer - witness]

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[wrote - zuckerberg's]

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS  
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

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